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December 22, 2016

Jeff S. Jordan
Assistant General Counsel
Federal Election Commission
Office of Complaints Examination and Legal Administration
999 E Street, NW
Washington, DC 20463

Re: MURs 7169, 7170, 7171, 7172, 7173, 7174, 7175, 7176, 7177, 7178, 7179, 7182, 7187, and 7188

Dear Mr. Jordan:

170044433188

In response to the complaints filed by the Foundation for Accountability and Civic Trust ("FACT" or the "Complainant"), we write as counsel to DCCC and Kelly Ward in her official capacity as treasurer in MURs 7169, 7170, 7171, 7172, 7173, 7174, 7175, 7176, 7178, 7179, 7182, 7187, and 7188 (collectively, the "Complaints"); Santarsiero for Congress and Lora Haggard, in her official capacity as treasurer, in MUR 7169; Ruben Kihuen for Congress and Jay Petterson, in his official capacity as treasurer, in MUR 7170; Nelson for Wisconsin and Dr. Beth Gillis, in her official capacity as treasurer, in MUR 7171; Colleen Deacon for Congress and Jennifer May, in her official capacity as treasurer, in MUR 7172; Applegate for Congress and Douglas Applegate, in his official capacity as treasurer, in MUR 7173; Mowrer for Iowa and Dennis Skinner, in his official capacity as treasurer, in MUR 7174; Texans for Pete and Wayne Alexander, in his official capacity as treasurer, in MUR 7175; Suzanna Shkreli for Congress and Jennifer May, in her official capacity as treasurer, in MUR 7176; Carroll for Colorado and Mitchell S. Wright, in his official capacity as treasurer, in MUR 7177; Eggman for Congress and Jay Petterson, in his official capacity as treasurer, in MUR 7178; Stephanie Murphy for Congress and Jennifer May, in her official capacity as treasurer, in MUR 7179; Bryan Caforio for Congress and Gonzalo Freixes, in his official capacity as treasurer, in MUR 7182; Friends of Christina M. Hartman and Diane Toapkian, in her official capacity as treasurer, in MUR 7187; and LuAnn Bennett for Congress and Jennifer May, in her official capacity as treasurer, in MUR 7188 (collectively, "Respondents" and individually, each a "Respondent").

INTRODUCTION

These Complaints involve advertisements paid for by the DCCC that supported the election of the named Democratic congressional candidates, and that also opposed the

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election, actions, or policies of Donald J. Trump, the Republican candidate for President. The Complaints present three legal issues, none of which is new or complicated: (1) whether the DCCC properly attributed the costs of the advertisements among the multiple candidates appearing in them according to 11 C.F.R. § 106.1(a); (2) whether the DCCC correctly accounted for the portion of the expenses attributed to Donald Trump; and (3) whether the DCCC and the congressional campaigns refrained from coordinating the ads with Hillary for America ("HFA"), so that none of their costs would represent in-kind contributions to HFA.

Because the answer to each of these questions is yes, there is no reason to believe Respondents violated the Federal Election Campaign Act of 1971, as amended (the "Act") or the regulations of the Federal Election Commission (the "FEC" or "Commission"):

First, the DCCC followed the process mandated by Commission regulations and long-standing Commission authority and attributed the cost of the advertisements among the multiple candidates appearing in them on a time-space basis, "according to the benefit reasonably expected to be derived." The Complaints ignore clear Commission authority requiring attribution among multiple candidates in this case of advertisements like these and present no facts to show that any attribution was done incorrectly. Instead, relying solely on one inaccurate news article, they simply assume that the advertisements were misattributed under the concept of "hybrid advertising" based on a generic party reference, which was not the case. These advertisements simply present a text book example of appropriately attributing expenditures under 11 C.F.R. § 106.1(a).

Second, the facts show that the DCCC correctly accounted for and reported the expenses attributable to Donald Trump. Some of the advertisements expressly advocated Trump's defeat, while others did not. The first were reported as independent expenditures, while the second were not, according to the Act and Commission regulations.³

Moreover, as a national party committee, the DCCC had an interest both in urging Donald Trump's defeat and criticizing his policies, above and beyond its central mission of supporting House candidates. Donald Trump was at the top of the ticket and the face of the Republican Party. He advocated policies and took actions strongly opposed by Democratic Party adherents. By expressly advocating Donald Trump's defeat, and by criticizing policy positions he espoused, that were strongly identified with him in the public mind, the DCCC alternatively promoted his defeat and mobilized Democratic opposition to his policies, the latter of which also helped support the ticket as a whole.

Third, none of the advertisements at issue was coordinated with HFA. In fact, the DCCC and campaigns took specific steps to avoid coordination with HFA. The Complaints present no facts to support any claim of coordination, but simply assume that it must have

¹ 11 C.F.R. § 106.1(a)(1).

² See Scott Bland, Dems use loophole to pump millions into fight for the House, Politico, Oct. 18, 2016, http://www.politico.com/story/2016/10/democrats-house-campaign-money-229957.

³ See 11 C.F.R. § 100.16(a) (linking definition of "independent expenditure" to express advocacy).

occurred because a party committee was involved in the advertisements—a presumption that the Supreme Court struck down long ago.⁴

The only factor that makes the resolution of these matters in any way complicated is the Complainant itself. As it has done before, FACT has flooded the Commission with fourteen complaints involving a wide array of respondents, in a clear effort to drain Respondents' resources and burden the Commission, with the ultimate effect of chilling speech and impeding the progress of other, non-frivolous enforcement matters. FACT relied on a single news article to "support" its conclusory allegations and focused the entire Complaints on generic party hybrid advertising that never occurred. The Complaints even carelessly swept up two ads that were attributed entirely to the relevant House campaigns and paid for completely with campaign funds and with coordinated party expenditure authority.

The Respondents complied with longstanding Commission regulations to support and oppose multiple candidates and promote the party as a whole. Because the costs were correctly attributed among multiple candidates, because the ads were correctly reported, and because there was no prohibited coordination with HFA, there is no reason to believe that any violation occurred, and the FEC should immediately dismiss these Complaints.

FACTS

The DCCC is the House campaign committee of the Democratic Party. Its principal mission is to support Democratic congressional candidates and other candidates around the country. In 2016, as before, a key part of the DCCC's activities involved financing television advertisements. Under Commission rules, the legal treatment of these advertisements varies by content—for example, whether they identify clearly identified candidates and, if so, how many; whether they expressly advocate the candidates' election or defeat; and whether they are coordinated with those candidates. The DCCC has had a long history of not simply making coordinated expenditures in support of House campaigns, but using communications to promote the interests of the Democratic Party as a whole.

The presidential candidacy of Donald Trump provided the DCCC with a unique opportunity to promote Democratic House candidates, oppose Trump's election, and mobilize the Democratic Party against Trump's positions for the benefit of the whole ticket. Trump was a major issue in House campaigns, his defeat was a vital concern for Democratic adherents, and fighting back against his policy positions and actions was important to the party as a whole. The DCCC saw the opportunity to pursue all three of these objectives.

⁴ See Colorado Republican Fed. Campaign Comm. v. FEC, 518 U.S. 604, 614-15 (1996) (invalidating prohibition on party independent expenditures); McConnell v. FEC, 540 U.S. 93, 214 (2003), overruled in part on other grounds by Citizens United v. FEC, 558 U.S. 310 (2010) (invalidating requirement that party choose between making independent or coordinated expenditures).

⁵ See FEC MUR 6916, First General Counsel's Report (Oct. 22, 2015).

⁶ See, e.g., 11 C.F.R. § 110.2(c)(2)(ii).

¹ See, e.g., FEC Advisory Opinion 1985-14 (DCCC).

These Complaints are about advertisements that the DCCC undertook in service of these multiple objectives. Supervised by a senior DCCC employee, DCCC staff worked with House campaigns to develop and produce the advertisements beginning with script development through the advertising buying phase. Each of the advertisements involved explicit references to clearly identified House candidates and a clearly identified discussion of Donald Trump and were accounted for according to the following model:

- Some of the advertisements expressly advocated the defeat of both the Republican House candidate and Trump. (e.g., "Vote No on [Republican congressional candidate] and Donald Trump"). In these cases, the DCCC paid for and reported the portion of the advertisement attributable to Trump as an independent expenditure opposing him. The remainder was either paid entirely by the Democratic congressional campaign, or split between the campaign and the DCCC, with the DCCC treating its share of the remainder as a coordinated expenditure. Advertisements that included express advocacy against Donald Trump are discussed in MURs 7169, 7170, 7171, 7174, 7176, and 7182.
- Other ads mentioned both House candidates and Donald Trump, but did not expressly advocate Trump's defeat. Rather, these ads focused on Trump's positions on key issues like national security, immigration, women's health, or gun control and his actions causing unrest and harm to the country. In these cases, the portion of the advertisements that concerned congressional candidates was either paid in whole by the Democratic House campaign, or split between the campaign and the DCCC using funds available under the coordinated party expenditure limits. The remainder was paid for by the DCCC and reported as an operating expense. The ads that did not expressly advocate Trump's defeat are discussed in MURs 7172, 7175, 7177, 7178, 7179, and 7188.

In all of these advertisements, the DCCC attributed the relevant expenses between the referenced candidates—i.e., the House candidate and Donald Trump—on a time/space basis,

⁸ See Exhibit A (affidavit of Michael Ian Russell)..

⁹ See Exhibit B (relevant pages of FEC reports).

The advertisement in MUR 7169 can be found here: https://www.youtube.com/watch?v=7mb2DsowG00. The advertisement in MUR 7170 can be found here: https://www.youtube.com/watch?v=ulkmwN7ivMU. The advertisement in MUR 7174 can be found here: https://www.youtube.com/watch?v=g.4kBjw8r-U. The advertisement in MUR 7176 can be found here: https://www.youtube.com/watch?v=WCx3ObETyrE. The advertisement in MUR 7182 can be found here: https://www.youtube.com/watch?v=il8196BhvWg&feature=youtu.be.

¹¹ See Exhibit B.

¹² The advertisement in MUR 7172 can be found here: https://www.youtube.com/watch?v=nwdljKSaFdQ. The advertisement in MUR 7175 can be found here: https://www.youtube.com/watch?v=GJCZwJ3tYXw. The advertisement in MUR 7177 can be found here:

https://www.youtube.com/watch?v=7KxcnucjChU&feature=youtu.be. The advertisement in MUR 7178 can be found here: https://www.youtube.com/watch?v=HlxNUxf-t80. The advertisement in MUR 7179 can be found here: https://www.youtube.com/watch?v=Opdllznhrf4. The advertisement in MUR 7188 can be found here: https://www.youtube.com/watch?v=epFwW3WyOWo. For the advertisement in MUR 7177, the Colorado Democratic Party similarly split the costs of the advertisement with Carroll for Colorado on a time/space basis.

determining the portion of each ad that related to each candidate and allocating accordingly. As mentioned above, two of the Complaints involved ads that were paid for entirely with campaign funds, and with DCCC funds used under the coordinated party expenditure limit.¹³

All of the advertisements discussed in the Complaints were conceived and executed by the DCCC independently of HFA or its agents. 14 Because the ads would refer to Trump, the staff and campaigns were instructed not to coordinate them with HFA or its agents. 15 The Complaints make no specific allegation of coordination whatsoever, and the declarations accompanying this response demonstrate the absence of any request, suggestion, assent. substantial discussion or material involvement. 16 The declarations demonstrate also that there was no coordination through any common vendor, former employee or independent contractor. 17

LEGAL ANALYSIS

- L. The Costs of the Advertisements Were Properly Attributed Among Multiple Candidates According to the Benefit Reasonably Expected to Be Derived
 - A. Commission rules clearly provide for attribution among multiple candidates.

11 C.F.R. § 106.1(a) provides that "expenditures, including in-kind contributions, independent expenditures, and coordinated expenditures made on behalf of more than one clearly identified Federal candidate shall be attributed to each such candidate according to the benefit reasonably expected to be derived."18 For a television ad, the regulation is explicit about how to make this attribution: it "shall be determined by the proportion of space or time devoted to each candidate as compared to the total space or time devoted to all candidates."19 The Commission has repeatedly and consistently applied this regulation when evaluating communications that refer to multiple candidates. ²⁶ For example, when an advertisement identifies candidates in multiple races, the expenditure is attributed based on the time/space dedicated to each race (e.g., the time dedicated to advocating a congressional candidate and her opponent would be attributed separately from the time spent advocating for a presidential candidate).²¹ The portions of the broadcast communication that is dedicated to the legally

¹³ The advertisement in MUR 7173 can be found here: https://www.youtube:com/watch?v=Rrii1jNAe-I. The advertisement in MUR 7187 can be found here: https://www.youtube.com/watch?v=8DN@EgLEECA. See Exhibit B.

14 See Exhibit A.

¹⁶ Id.; see also Exhibit C (affidavit of media vendors).

¹⁷ The vast majority of vendors working on the ads at issue in these matters did not work for HFA. Two vendors who did work on two different advertisements also did work for HFA but did not use any non-public information about HFA's plans, projects, activities, or needs in working on the advertisement. See Exhibit C. ¹⁸ 11 C.F.R. § 106.1(a).

²⁰ See FEC Adv. Op. 2010-10 (NRL PAC); FEC Adv. Op. 2004-37 (Waters) ("attribution shall be determined by the proportion of space devoted to each candidate") (citing 11 C.F.R. § 106.1(a)(1)). ²¹ FEC Adv. Op. 2010-10 (NRL PAC).

required disclaimer and "stand by your ad" messages do not count for either candidate, but rather are split proportionately to the rest of the communication's content.²²

In attributing the cost of a communication among multiple candidates, the Commission does not look to whether or not the segment associated with a particular candidate contains express advocacy. For example, in Advisory Opinion 2004-01, issued to Bush-Cheney '04, Inc. and Alice Forgy Kerr for Congress, the Commission understood that the ad would "not mention or refer to the President's candidacy for re-election [or] expressly advocate the election nor defeat of any presidential candidate." Still, the Commission confirmed that the costs of the communication must be attributed between the two campaigns based on the proportion of space or time devoted to each candidate under 11 C.F.R. § 106.1(a), even though the ad expressly advocated one candidate's election and not the other's. Similarly, in Advisory Opinion 2010-10, the Commission held that when a broadcast communication expressly advocated the election of one candidate, referred to an opposing candidate without expressly advocating defeat, and expressly advocated the election of a third candidate in an altogether different race, the references to the opposing candidate would be attributed to the first candidate under 11 C.F.R. § 106.1(a).

The Commission has applied section 106.1's attribution principles even when only one candidate is referenced but the ad concerned multiple purposes. For example, in Advisory Opinion 2004-29, the Commission allowed Representative Todd Akin to appear in an ad supporting a ballot issue committee, but advised his campaign only to "reimburse the sponsor of the advertisement for the attributable portion of the cost of these coordinated communications," despite the fact that no candidate besides Akin would appear in the ad. 26 And in Advisory Opinion 2006-11, the Commission considered a state party mailing that would expressly advocate for a federal candidate and for other generically referenced candidates of the party committee. 27 The Commission held that, while no less than 50% of the costs could reasonably be attributed to the one identified candidate, "it is appropriate to apply analogous 'space or time' principles set out in 11 C.F.R. 106.1(a)" and that "the benefit reasonably expected to be derived' by the clearly identified candidate should be

²² Specifically, the Commission has advised that the disclaimer component of the communication should be attributed among the candidates or purposes "in the same proportion as the time or space" devoted to each race or purpose. FEC Adv. Op. 2010-10 (NRL PAC) at 6; see also FEC Adv. Op. 2007-09 (Kerry-Edwards) (permitting disclaimer to be attributed among multiple purposes). For instance, in NRL PAC, the FEC stated that, where 16 seconds of a 30-second advertisement are devoted to advocating for a presidential candidate, 8 seconds are devoted to advocating against a Senate candidate, and 6 seconds are devoted to a disclaimer, two-thirds of the expenditure should be reported as having been made in support of the presidential candidate and one-third should be reported as having been made in opposition to the Senate candidate. FEC Adv. Op. 2010-10 at 6 n.7. In Kerry-Edwards, the Commission found that the portion of broadcasting costs incurred by the Kerry-Edwards Campaign in complying with disclaimer requirements were expenses that may be paid for with legal funds. See FEC Adv. Op. 2007-09.

²³ FEC Adv. Op. 2004-01 (Bush/Kerr).

²⁴ Id. at 6. The Commission has since adopted a specific exemption from the coordination rules that vitiates the general attribution rule in the case of certain "endorsement" ads. See 11 C.F.R.§ 109.21(g). However, that exception is not at issue in these matters.

²⁵ FEC Adv. Op. 2010-10 (NRL PAC).

²⁶ FEC Adv. Op. 2004-29 (Akin) at 6.

²⁷ FEC Adv. Op. 2006-11 (Washington Democratic State Central Committee).

measured by determining the amount of space devoted to the clearly identified candidate as compared to the amount of space devoted to the generically referenced party candidates."²⁸

Although the ads aired by Respondents are not so-called "hybrid" ads like those in Advisory Opinion 2006-11, the Commission has nonetheless found that ads that concern candidates, issues, and the party generally are allocated just like ads that concern multiple candidates. The Act "generally permit[s] (and in some cases require[s]) the allocation of expenses attributable to more than one purpose" and "allocation is an appropriate way to fund activities with multiple purposes" as held over and over by the Commission. ²⁹ These ads that— in each case—referred to two candidates in two different elections, sometimes expressly advocating Trump's defeat and sometimes opposing his policy positions, were allocated in accordance with these longstanding Commission interpretations.

B. Respondents attributed the advertisements correctly.

The advertisements in MURs 7169, 7170, 7171, 7172, 7174, 7175, 7176, 7177, 7178, 7179, 7182, and 7188 were all correctly attributed among the Democratic House candidates and Donald Trump, just as 11 C.F.R. § 106.1(a) and Commission authority contemplate. The plain language of 11 C.F.R. § 106.1(a) requires that when an expenditure for a broadcast communication clearly identifies more than one Federal candidate, the costs shall be attributed as determined by "the proportion of space or time devoted to each candidate as compared to the total space or time devoted to all candidates." The FEC has additionally confirmed that when an advertisement mentions two opponents running for the same office and a third candidate for a different office, the costs are "allocated among the electoral races, based on a time or space analysis." This is how Respondents attributed the costs of these advertisements in this case.

All of the ads at issue referred to clearly identified House candidates and Donald Trump, a clearly identified presidential candidate running. The portions of the ads that were spent discussing the House candidates were attributed to the Democratic House candidate. Conversely, the portions of the ads that were spent discussing Trump were attributed to Trump. If a portion of an ad concerned both the House candidate and Trump, that period of time was attributed between the two races on a reasonable basis. The portion of each ad that was spent displaying the written, visual, and spoken disclaimer as mandated by law was allocated between the two races "in the same proportion as the time or space" devoted to each race in the other portions of the ad, just as the Commission instructed in Advisory Opinion 2010-10.

²⁸ *Id*. at 4.

²⁹ See FEC Adv. Op. 2010-14 (DSCC) (approving allocation of expense between campaign and recount activities); see also FEC Adv. Op. 1988-06 (Gore for President) (holding that "expenditures within the purview of the Act may be made for multiple purposes [and] the Commission believes that expenditures to run an advertisement which includes a fundraising solicitation may be allocated on a 'reasonable basis'"); First General Counsel's Report at 22, FEC Matter Under Review 4131(holding that multi-purpose mailers that include express advocacy of candidates and a solicitation for contributions to a state PAC should be allocated between the mixed purposes).

³⁰ FEC Adv. Op. 2010-10 (NRL PAC).

Take, for example, the advertisement sponsored by the DCCC and Mowrer for Iowa at issue in MUR 7174.³¹ The advertisement contains express advocacy against Representative David Young and Donald Trump. The advertisement criticizes the positions of both Trump and Young and ends by saying, "Vote No on Donald Trump and David Young." The ad starts with approximately 5 seconds concerning Donald Trump and is followed by 4 seconds attributable to the House race, 5 seconds attributable to Trump, 4 seconds attributable to the House race, 3 seconds attributable to Trump, 5 seconds attributable to the House race, and finally 4 seconds containing the legally required disclaimer. The first 26 seconds of the advertisement were equally divided between the congressional race and Donald Trump and the portion of the advertisement spent dedicated to the disclaimer was split on the same proportion. The advertisement was attributed 50% to the Mowrer campaign and 50% to Donald Trump.

Consider also the ad sponsored by the DCCC and Colleen Deacon for Congress at issue in MUR 7172. The ad critiques the positions of both Rep. John Katko and Donald Trump, but does not expressly advocate Trump's defeat. The ad starts with approximately 4 seconds equally attributable to both the House race and Trump and is followed by 2.5 seconds attributable to Trump, 3.5 seconds attributable to the House race, 8 seconds attributable to Trump, 7 seconds attributable to the House race, 3 seconds equally attributable to both the House race and Trump, and ends with 2 seconds dedicated to the disclaimer. The first 28 seconds of the advertisement were equally divided between the House race and Trump, the portion of the advertisement spent dedicated to the disclaimer was split on the same proportion, and so the advertisement was attributed 50% to the Deacon campaign and 50% to Trump. The same methodology was used to attribute the ads generally, and the Complaints provide no basis to question Respondents' attribution.

C. The expenses attributed to the House candidates were correctly reported.

The portion of the ads attributable to the House candidates were paid for and reported as required by the Act and Commission regulations. In almost every case, and as reported to the Commission, the relevant Democratic House campaign directly paid the relevant media vendor for its attributable portion of the costs. In two cases— the ad sponsored by the DCCC and Nelson for Wisconsin in MUR 7171, and the ad sponsored by the DCCC and Shkreli for Congress in MUR 7176—the DCCC paid for some of the portion of the expenses that were attributable to the House campaign as a coordinated expenditure. For the Nelson campaign, the DCCC paid \$33,700 of the costs attributable to the campaign, and for the Shkreli ad, the DCCC paid \$52,960. These payments were well within the DCCC's coordinated party expenditure limits for each race and were reported to the Commission. The Commission has repeatedly held that when a federal campaign pays for the portion of an advertisement

33 See Exhibit B.

³¹ Jim Mowrer, Now We Understand, YouTube (Oct. 19, 2016), https://www.youtube.com/watch?v=g_4kBjw8r-U.
³² Colleen Deacon, Unsettled, YouTube (Oct. 8, 2016), https://www.youtube.com/watch?v=Ch4ToJp3Br0.

that is attributable to the relevant candidate under 11 C.F.R. § 106.1(a), no contribution results from the payment of the remaining portion of the expenses for the advertising.³⁴

Contrary to FACT's speculative and unfounded allegations, the DCCC did not make any excessive contributions to any of the House campaigns, because the expenses attributable to those campaigns were either paid for by the campaigns themselves, or by the DCCC under its coordinated expenditure authority.

D. Two of the communications at issue were paid for entirely by the House campaigns and the DCCC as coordinated party expenditures.

For reasons known only to FACT, that organization filed two complaints regarding ads paid for entirely by the relevant Democratic House campaign and under the DCCC's coordinated party expenditure authority. Given the way that they were funded, these expenditures for these ads cannot possibly amount to excessive contributions from the DCCC to the House campaign. MUR 7173 concerns an ad sponsored by the DCCC and Applegate for Congress. The DCCC spent a total of \$91,200 to assist in the airing of this ad and Applegate for Congress paid for all other expenses associated with its creation and airing. The funds spent by the DCCC toward the ad were treated as coordinated party expenditures and reported accordingly.³⁵

Similarly, MUR 7187 concerns an advertisement sponsored by the DCCC and Friends of Christina M. Hartman. The DCCC spent a total of \$96,070 to assist in the airing of this ad and Friends of Christina M. Hartman paid for all other expenses associated with its creation and airing. The funds spent by the DCCC toward this ad were treated as coordinated party expenditures and reported accordingly.³⁶

Thus, in MURs 7173 and 7187, not even the question of attribution was present. At no point was there any basis for FACT to allege any violation of the limits as to the House campaigns.

II. The Portions of the Ads Attributable to Donald Trump Were Correctly Reported

Except in MUR 7177, the portions of the ads referenced by the Complaints and attributable to Donald Trump were paid for by the DCCC. In MUR 7177, the portion of the ad attributable to Trump was paid for by the Colorado Democratic Party. In each case, the party committee either filed the necessary independent expenditure report as to Trump or

³⁴ See FEC Adv. Op. 2004-37 (Waters) at 2 (holing that payment for a "brochure would not constitute support of, or be an in-kind contribution to, the Federal candidates listed in the brochure, provided that the Federal candidates provide reimbursements in the appropriate amount in a timely manner"); FEC Adv. Op. 2004-01 (Bush/Kerr) at 6 (holding that "if the Bush-Cheney Committee reimburses the Kerr Committee for its attributable share of the expenses, there is no contribution"); FEC Adv. Op. 2004-29 (Akin).

³⁵ See Exhibit B.

³⁶ *Id*.

reported the attributable portion of the ad as operating expenditures, depending on whether the ad contained express advocacy.

To be an independent expenditure, a communication must include "express advocacy" for or against a "clearly identified" candidate.³⁷ However, although all of the relevant ads "clearly identified" Trump under 11 C.F.R. § 100.17, only the ads at issue in MURs 7169, 7170, 7171, 7174, 7176, and 7182 included "express advocacy" against him.³⁸ In these latter cases, the DCCC reported the portions of the ads attributable to Trump as independent expenditures opposing him.³⁹

The ads in MURs 7172, 7175, 7177, 7178, 7179, and 7188 did not expressly advocate Trump's defeat. Accordingly, the portions of these ads' costs that were attributable to Trump were reported by the party as operating expenditures and not as independent expenditures. The definition of "express advocacy" is clearly set forth in the Commission's regulations, and when a communication does not meet this definition, the Commission has repeatedly held that the communication does not constitute an independent expenditure.⁴⁰

A communication expressly advocates if it: uses phrases such as "vote for the President," "Smith for Congress," or "Bill McKay in '94," or uses campaign slogans or individual words, which in context "can have no other reasonable meaning than to urge the election or defeat of one or more clearly identified candidates," such as a message saying "Nixon's the One," or "Carter '76," or when taken as a whole and with limited reference to external events, "could only be interpreted by a reasonable person as containing advocacy of the election or defeat" of a candidate because the "electoral portion of the communication is unmistakable, unambiguous, and suggestive of only one meaning" such that reasonable minds "could not differ as to whether it encourages actions to elect or defeat" the candidate. A message constitutes express advocacy "only if it contains a clear call to a specific electoral

³⁷ 11 C.F.R. § 100.16.

³⁸ Dangerous for PA Women, YouTube (Oct. 20, 2016) at :20 ("Say No To Donald Trump & Brian Fitzpatrick"), https://www.youtube.com/watch?v=7mb2DsowG00; Ruben Kihuen for Congress, Our Values, YouTube (Oct. 18, 2016) at :23 ("Vote NO on Cresent Hardy and Donald Trump"),

https://www.youtube.com/watch?v=ulkmwN7ivMU; Nelson for Wisconsin, No, YouTube (Oct. 10, 2016) at :25 ("Mike Gallagher says we still have to support Donald Trump. No, we don't; we don't have to support Mike Gallagher either"), https://www.youtube.com/watch?v=LS-gU95vin9U; Jim Mowrer, Now We Understand, YouTube (Oct. 19, 2016) at :28 ("Vote No on Donald Trump and David Young"),

https://www.youtube.com/watch?v=g_4kBjw8r-U; Suzanna Shkreli for Congress, Brags, YouTube (Oct. 14, 2016) at :22 ("Vote No on Donald Trump and Mike Bishop"), https://www.youtube.com/watch?v=WCx3ObETyrE; Bryan Caforio for Congress, Stand Up, YouTube (Oct. 12, 2016) at :27 ("Vote No on Trump"), https://www.youtube.com/watch?v=il8196BhvWg&feature=youtu.be.

³⁹ See Exhibit D (excerpts from relevant independent expenditure reports). There would have been no basis to consider the portions of the advertisements attributable to Trump as coordinated communications with the House campaigns. See Coordinated and Independent Expenditures, 68 Fed. Reg. 421, 431 (Jan. 3, 2003) (conduct standard cannot "be satisfied without some link between the request or suggestion and the candidate or political party who is, or that is, clearly identified in the communication").

⁴⁰ See, e.g., FEC Adv. Op. 1985-14 (DCCC).

⁴¹ 11 C.F.R. § 100.22.

action."⁴² Even according to the Ninth Circuit, which has taken a very expansive approach to defining express advocacy:

Speech cannot be "express advocacy of the election or defeat of a clearly identified candidate" when reasonable minds could differ as to whether it encourages a vote for or against a candidate or encourages the reader to take some other kind of action. We emphasize that if any reasonable alternative reading of speech can be suggested, it cannot be express advocacy subject to the Act's disclosure requirements.⁴³

Even by this broad standard, the advertisements at issue in MURs 7172, 7175, 7177, 7178, 7179, and 7188 did not include any words of express advocacy regarding Trump. In each case, a reasonable alternative reading exists for the communication as it pertains to Trump, insofar as they criticize his policy positions and their negative effects.

Several of the advertisements discuss Republican congressional candidates "support" for Donald Trump's positions. For example, in the advertisement at issue in MUR 7172 the script is as follows:

VOICE OVER: In an unsettled world, John Katko and Donald Trump's approach takes us down a dangerous path. [Showing footage of global unrest].

TRUMP: "I love war in a certain way."

VOICE OVER: But when asked about supporting Trump, Katko said ...

KATKO: "I absolutely will support."

TRUMP: "Tell them to go f--- themselves."

VOICE OVER: When national security leaders condemn Trump's reckless statements on foreign policy...

INTERVIEWER: "People are wondering how those things can happen and you not flat out denounce it?"

KATKO: "I'm more concerned about my race."

VOICE OVER: Not about the safety of our families. Trump and Katko put our national security at risk.

[DISCLAIMER].44

⁴² Statement of Reasons of Vice Chairman Petersen and Commissioners Hunter and McGahn at 4, Matter Under Review 6113 (Dec. 18, 2009).

⁴³ FEC v. Furgatch, 807 F.2d 857, 864 (9th Cir. 1987).

⁴⁴ Colleen Deacon, Unsettled, YouTube (Oct. 8, 2016), https://www.youtube.com/watch?v=Ch4ToJp3Br0.

However, the word "support" in this context cannot only be interpreted as a call to vote against Donald Trump. Rather, it is intended to critique Donald Trump's desire for war, dangerous foreign policy "approach," and other previous actions and policy positions and Representative Katko's support of Trump despite these positions. This advertisement concludes with the statement that "Trump and Katko put our national security at risk." The advertisement does not say that viewers should vote against Donald Trump for President but refers to the contemporaneous actions of both Representative Katko and Donald Trump that are adverse to the United States' national security interests.

Similarly, consider the advertisement at issue in MUR 7175. The script of advertisement is as follows:

TRUMP: We're going to build a wall.

VOICE OVER: Donald Trump is tearing us apart. [SHOWING CURRENT NATIONAL UNREST]. Trump called a judge unqualified because of his Mexican heritage.

TRUMP: He's a Mexican. We're building a wall between here and Mexico.

VOICE OVER: And called Mexicans rapists and murderers. Donald Trump. Too dangerous for us. But Will Hurd says he could still support Donald Trump. And Will Hurd shares the same bad ideas.

WILL HURD: A wall absolutely makes sense.

VOICE OVER: Will Hurd. He's the wrong choice for Texas families.

[DISCLAIMER].45

This advertisement refers to several statements and policy positions of Donald Trump and observes the contemporaneous effects: his positions and actions are "tearing us apart" at this time. The advertisement does not include a call to defeat Donald Trump in the presidential election, but it does include a call to defeat Representative Hurd: it says that he is the "wrong choice for Texas families" because of his support of Donald Trump's positions. Citing Representative Hurd's support for Donald Trump as a reason to defeat Representative Hurd is not express advocacy with regard to Donald Trump. There is no portion of the advertisement that could only be interpreted as a call to vote against Donald Trump and thus the advertisement does not contain express advocacy against Donald Trump as defined at 11 C.F.R. § 100.22. As there is no "express advocacy" or "clear call to a specific electoral action" with regard to Donald Trump in any of the advertisements discussed in MURs 7172, 7175, 7177, 7178, 7179, and 7188, no portion of any of these advertisements should have been reported as independent expenditures opposing Donald Trump.

⁴⁵ Wrong Choice for TX Families, YouTube (Oct. 4, 2015), https://www.youtube.com/watch?v=GJCZwJ3iYXw.

Because the portion of the advertisements discussed in MURs 7172, 7175, 7177, 7178, 7179, and 7188 attributable to Donald Trump did not contain express advocacy opposing Trump, they were properly reported by the DCCC and Colorado Democratic Party as operating expenditures. The Commission's regulations and previous decisions are clear: if a party committee airs a communication that does not constitute an independent expenditure or party coordinated communication, the expenses associated with the advertisements, or relevant portions thereof are operating expenditures.⁴⁶

III. The Complaint Presents No Genuine Allegation of Coordination with HFA, and The Facts Demonstrate That None Occurred

None of the relevant advertisements was coordinated with HFA. There was no coordination between the Respondents on the one hand, and HFA on the other, regarding any of the advertisements cited by the Complaints. None of the Complaints alleges any specific facts that could even be taken to suggest coordination.⁴⁷

Instead, the Complaints make the conclusory allegation that the advertisements were coordinated with HFA. However, such pure speculation cannot support a finding of a reason to believe. The Commission may find "reason to believe" only if a Complaint sets forth sufficient specific facts, which, if proven true, would constitute a violation of the Act. For claims of coordination, the Commission requires an even stronger showing: that Complainant provide "probative information of coordination." The Commission has also made clear that "unwarranted legal conclusions [drawn] from asserted facts" or "mere speculation" are *not* sufficient to find reason to believe that Respondents violated the Act through impermissible coordination. Because the Complaints rely exclusively on pure speculation and unwarranted legal conclusions for their coordination claims, there is no reason to believe any coordination occurred.

The Commission also must consider whether Respondents have provided "sufficiently compelling evidence" to refute the Complaints' claims. In this case, the declarations accompanying this response provide strong, probative evidence of the absence of coordination between Respondents and HFA on these ads. 51 The declaration of Michael Ian Russell, the DCCC's Deputy Executive Director and Political Director, is especially important. 52 Mr. Russell makes clear that he supervised the communications campaign at issue in these Complaints; that it did not involve any request, suggestion or assent from HFA; that he instructed those participating in the program to refrain from any

⁴⁶ FEC Adv. Op. 1985-14 (DCCC) ("DCCC may report these expenditures as operating expenditures.").

⁴⁷ See Exhibit A.

⁴⁸ Statement of Reasons, Commissioners Mason, Sandstrom, Smith, and Thomas, MUR 4960 (Dec. 21, 2001).

⁴⁹ FEC Matter Under Review 5999, Factual and Legal Analysis (Dec. 15, 2008); see also FEC Matter Under Review 6059, Factual and Legal Analysis, at 6 (Feb. 3, 2009).

⁵⁰ FEC Matter Under Review 4960 (Clinton for U.S. Exploratory Committee), Statement of Reasons of Commissioners David M. Mason, Karl J. Sandstrom, Bradley A. Smith, and Scott E. Thomas at 1 (Dec. 21, 2000). ⁵¹ See Exhibits A and C.

⁵² See Exhibit A.

communications with HFA regarding the ads; and that he knows of no deviation from these instructions.⁵³

Because the Complaints rely entirely on speculation to mount the claim of coordination, and because Respondents have provided compelling evidence to refute this speculation even when not required to do so, the Commission should dismiss these baseless claims.

CONCLUSION

The FACT complaints are based completely on an incorrect factual assumption and a blatant misunderstanding of the law. FACT assumed that the Respondents were allocating the advertisements at issue according to the Commission's guidance on generic party hybrid advertising and apparently believe that such hybrid advertising is the only case in which a committee should allocate an advertisement between multiple federal candidates or purposes. In reality, the Commission's regulations provide for the attribution of any communication that concerns multiple Federal candidates. The Respondents followed the Commission's attribution regulations here, and paid for and reported each portion of the advertisements according to the requirements of the Act.

There is absolutely no merit to the allegations in any of the complaints in MURs 7169, 7170, 7171, 7172, 7173, 7174, 7175, 7176, 7177, 7178, 7179, 7182, 7187, and 7188 and the Commission should dismiss all of these complaints against all of the Respondents immediately.

Very truly yours,

= M./2

Marc E. Elias

Brian G. Svoboda

Graham M. Wilson

Rachel L. Jacobs

Enclosure

Counsel to:

DCCC

Santarsiero for Congress and Lora Haggard, in her official capacity as treasurer Ruben Kihuen for Congress and Jay Petterson, in his official capacity as treasurer Nelson for Wisconsin and Dr. Beth Gillis, in her official capacity, as treasurer Colleen Deacon for Congress and Jennifer May, in her official capacity as treasurer Applegate for Congress and Douglas Applegate, in his official capacity as treasurer

⁵³ Id.

Mowrer for Iowa and Dennis Skinner, in his official capacity as treasurer Texans for Pete and Wayne Alexander, in his official capacity as treasurer Suzanna Shkreli for Congress and Jennifer May, in her official capacity as treasurer Carroll for Colorado and Mitchell S. Wright, in his official capacity as treasurer Eggman for Congress and Jay Petterson, in his official capacity as treasurer Stephanie Murphy for Congress and Jennifer May, in her official capacity as treasurer Bryan Caforio for Congress and Gonzalo Freixes, in his official capacity as treasurer Friends of Christina M. Hartman and Diane Toapkian, in her official capacity as treasurer

LuAnn Bennett for Congress and Jennifer May, in her official capacity as treasurer

Exhibit A

BEFORE THE

FEDERAL ELECTION COMMISSION

DECLARATION OF MICHAEL IAN RUSSELL

- I, Michael Ian Russell, do declare and state as follows:
 - 1. During the 2016 election, I worked for DCCC as Deputy Executive Director and Political Director. Through that position, I am familiar with the matters discussed herein. At no point during the 2016 election cycle did I serve as an employee, independent contractor, vendor, or agent of Hillary for America ("HFA").
 - 2. As the Deputy Executive Director and Political Director of DCCC, I worked with, and supervised other DCCC employees who worked with, numerous House campaigns on television advertisements that mentioned Donald Trump. Specifically, I worked with (a) Santarsiero for Congress on the advertisement discussed in the complaint in MUR 7169; (b) Ruben Kihuen for Congress on the advertisement discussed in the complaint in MUR 7170 (c) Nelson for Wisconsin on the advertisement discussed in the complaint in MUR. 7171 (d) Colleen Deacon for Congress on the advertisement discussed in the complaint in MUR 7172 (e) Applegate for Congress on the advertisement discussed in the complaint in MUR 7173 (f) Mowrer for Iowa on the advertisement discussed in the complaint in MUR 7174 (g) Texans for Pete on the advertisement discussed in the complaint in MUR 7175 (i) Shkreli for Congress on the advertisement discussed in the complaint in MUR. 7176 (i) Carroll for Colorado on the advertisement discussed in the complaint in MUR. 7177 (k) Eggman for Congress on the advertisement discussed in the complaint in MUR. 7178 (1) Murphy for Congress on the advertisement discussed in the complaint in MUR 7179 (m) Bryan Caforio for Congress on the advertisement discussed in the complaint in MUR 7182 (n) Friends of Christina M. Hartman on the advertisement discussed in the complaint in MUR 7187 and (o) LuAnn Bennett for Congress on the advertisement discussed in the complaint in MUR 7188 (each a "Campaign" or "Advertisement" or collectively the "Campaigns" and "Advertisements," respectively). I took the lead at DCCC for managing this advertising program. I supervised this program and all DCCC staff working on these Advertisements. I was also in contact, directly or indirectly through my staff, with each of the Campaigns involved in these Advertisements.
 - 3. This program was conceived by DCCC without any request, suggestion, or assent by HFA or its agents. DCCC believed that the advertising program would be an effective way to promote our Democratic House candidates and the Democratic Party, given the intense opposition among Democratic voters to Donald Trump and the policies and positions he espoused.
 - 4. I managed every aspect of the creation, production, and dissemination process for each of these Advertisements, starting with script development through the advertising buying phase of each Advertisement. To that end, with a core group of DC:CC staff, I worked directly with each Campaign and advertising vendor to draft each script and produce and edit each Advertisement.

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- 5. I instructed my staff working on the Advertisements and the staff of Campaigns involved with the Advertisements not to discuss any aspect of these Advertisements with HFA or its agents. Likewise, my staff and the Campaigns were instructed not to have any involvement with HFA or its agents with regard to these Advertisements. I am not aware of any breach of or deviation from this protocol.
- 6. To the best of my knowledge, and consistent with the instructions I gave; these Advertisements were developed internally at DCCC in coordination with each Campaign without any communication with or from Hillary for America or its agents. Likewise, to the best of my knowledge, none of the Advertisements were created, produced, or distributed at the suggestion or request of HFA or its agents nor did they assent to the creation, production, or distribution of any of the Advertisements.
- 7. In my work for DCCC on the Advertisements, to the best of my knowledge, neither I nor any DCCC employee or Campaign staff working on these Advertisements had any involvement with HFA or its agents regarding any Advertisement in any way, including, but not limited to:
 - i. the content of any Advertisement;
 - ii. the intended audience for any Advertisement;
 - iii. the means or mode of any Advertisement;
 - iv. the specific media outlet used for any Advertisement:
 - v. the timing or frequency of any Advertisement; or
 - vi. the duration of any Advertisements.
 - 8. In my work for DCCC on the Advertisements, to the best of my knowledge, neither I nor any DCCC employee or Campaign staff working on these Advertisements had discussions about with HFA or its agents about any Advertisement or HFA's plans, projects, activities, or needs with regard to any Advertisement. Neither HFA nor its agents conveyed to me, and to the best of my knowledge to any DCCC employee or Campaign staff working on these Advertisements, any relevant information about HFA's plans, projects, activities, or needs concerning any Advertisement.
 - 9. To the best of my knowledge, no DCCC employee or Campaign staff working on these Advertisements was employed by HFA at any time during the 120 days prior to the date that each Advertisement was aired.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 2/4 day of December, 2016.

Image# 201612089039916605

SCHEDULE F. (FEC Form 3X) ITEMIZED COORDINATED PARTY EXPENDITURES MADE BY

POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S)
ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE

PAGE 109105 OF 109107 FOR LINE 25 OF FORM 3X (To be used only by Political Committees in the General Election) NAME OF COMMITTEE (In Full) DCCC Full Name of Subordinate Committee Has your committee been designated to make coordinated expenditures by a political party committee? DCCC YES YES) NO Mailing Address If YES, name the designating committee: 430 South Capitol Street, SE Democratic National Committee & State ZIP Code Pennsylvania Democratic Party Washington 20003-4024 DC Full Name (Last, First, Middle Initial) of Each Payes . - Memo Item Purpose of Expenditure Media Servicos Mundy Katowitz Media, Inc. Category/ Mailing Address 1322 G Street, SE Type Date City State Zip Code "21" 2016 10 Washington DC 20003 Name of Fuderal Candidate: Supported Oilice Sought: House State: Amount Hartman, Christina... 16 Sonate District: 96070.00 Presidential Aggregate General Election 96070.00 Expenditure for this Candidate Transaction ID : SF-953178 Full Name (Last, First, Middle Initial) of Each Payce C Memo Ilem Purpose of Expenditure Category/ Mailing Address Туре Date Zip Code City State Name of Federal Candidate Supported Office Sought: . House State: Amount Sanate District: Presidential Aggregate General Election Expenditure for this Candidate Full Name (Last, First, Middle Initial) of Each Payee : ! Memo Item Purpose of Expenditure Category/ Mailing Address Type Date State Zip Code Nume of Federal Candidate Supported Office Sought House State: Amount Sonale District: Presidential Aggregate General Election Expenditure for this Candidate 96070.00 SUBTOTAL of Expenditures This Page (optional)..... TOTAL This Period (last page this line number only)......

Image# 201610279034718056

SCHEDULE F (FEC Form 3X)

ITEMIZED COORDINATED PARTY EXPENDITURES MADE BY POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S) ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE

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PAGE 47529 OF 47535

SCHEDULE F (FEC Form 3X)

ITEMIZED COORDINATED PARTY EXPENDITURES MADE BY POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S) ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE

PAGE 109107 OF 109107 FOR LINE 25 OF FORM 3X (To be used only by Political Committees in the General Election) NAME OF COMMITTEE (In Full) DCCC Full Name of Subordinate Committee Has your committee been designated to make coordinated expenditures by a political party committee? **DCCC** × YES If YES, name the designating committee: Mailing Address 430 South Capitol Street, SE 2nd Floor **Democratic National Committee** City State ZIP Code Washington 20003-4024 Full Name (Last, First, Middle Initial) of Each Payee ☐ Memo Item Purpose of Expenditure **Media Services** Murphy Vogel Askew Reilly, LLC Category/ Mailing Address 1199 N. Fairfax St Type Date Suite 220 City State Zip Code 10 2016 Alexandria 22314 Name of Federal Candidate Supported Office Sought: House State: WI **Amount** District: 80 Nelson, Tom. . . Senate Presidential 1000.00 Aggregate General Election 33700.00 Expenditure for this Candidate Transaction ID: SF-953282 Full Name (Last, First, Middle Initial) of Each Pavee ☐ Memo Item Purpose of Expenditure Category/ Mailing Address Type Date State Zip Code Name of Federal Candidate Supported Office Sought: House State: Amount Senate District: Presidential Aggregate General Election Expenditure for this Candidate Full Name (Last, First, Middle Initial) of Each Payee ☐ Memo Item Purpose of Expenditure Category/ Mailing Address Type Date City State Zip Code Name of Federal Candidate Supported Office Sought: House State: Amount Senate District:: Presidential Aggregate General Election Expenditure for this Candidate 1000.00 SUBTOTAL of Expenditures This Page (optional)....... 1543282.59 TOTAL This Period (last page this line number only).....

SCHEDULE F (FEC Form 3X)

ITEMIZED COORDINATED PARTY EXPENDITURES MADE BY POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S) ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE

ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE							PAGE	47535	OF 47535
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SCHEDULE F (FEC Form 3X) ITEMIZED COORDINATED PARTY EXPENDITURES MADE BY POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S)

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Exhibit C

BEFORE THE

FEDERAL ELECTION COMMISSION

DECLARATION OF MAURA JOHNSON - MUR 7179

- I, Maura Johnson, do declare and state as follows:
 - During the 2016 election, as a Media Supervisor at GMMB, Inc. ("GMMB"), I provided
 media buying services for Ralston Lapp Media, the consultant working with Stephanie
 Murphy for Congress. Through that position, I am familiar with the matters discussed
 herein.
 - 2. During that time, I worked with DCCC and Stephanie Murphy for Congress to distribute an advertisement discussed in the complaint in FEC Matter Under Review 7179 (the "Advertisement"). To the best of my knowledge and belief, I was the only employee of GMMB that worked on the Advertisement.
 - 3. GMMB worked for Hillary for America ("HFA") during the 2016 election cycle.
 - 4. To the best of my knowledge, the Advertisement was not created, produced, or distributed at the suggestion or request of HFA or its agents and HFA or its agents did not assent to the creation, production, or distribution of the Advertisement.
 - 5. To the best of my knowledge, neither I, nor any employee or agent of GMMB working on the Advertisement, had any involvement with HFA or its agents regarding the Advertisement in any way, including, but not limited to:

MJ 12/21/16

- i. the content of the Advertisement;
- ii. the intended audience for the Advertisement;
- iii. the means or mode of the Advertisement;
- iv. the specific media outlet used for the Advertisement;
- v. the timing or frequency of the Advertisement; or
- vi. the duration of the Advertisement.
- 6. To the best of my knowledge, neither I, nor any employee or agent of GMMB working on the Advertisement, had discussions with HFA or its agents about the Advertisement.
- 7. To the best of my knowledge, neither I, nor any employee or agent of GMMB in working on the Advertisement, used or conveyed information about HFA's campaign plans, projects, activities, or needs to create, produce, or distribute the Advertisement.
- 8. To the best of my knowledge, neither I, nor any employee or agent of GMMB in working on the Advertisement, used information previously used by GMMB in providing services to HFA in relation to the distribution of the Advertisement.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this <u>31</u> day of December, 2016.

Maura Johnson

BEFORE THE FEDERAL ELECTION COMMISSION

DECLARATION OF DAVID DIXON AND RICHARD DAVIS, DIXON/DAVIS MEDIA GROUP LLC - MUR 7188

David Dixon and Richard Davis do declare and state as follows:

- During the 2016 election, we were partners at the Dixon/Davis Media Group LLC
 ("Dixon/Davis"). Through that position, we are familiar with the matters discussed
 herein.
- At the request of DCCC, and with the guidance of DCCC and their legal counsel,
 Dixon/Davis worked with DCCC and LuAnn Bennett for Congress to create, produce,
 and distribute an advertisement discussed in the complaint in FEC Matter Under Review
 7188 (the "Advertisement").
- 3. Dixon/Davis worked for Hillary for America ("HFA") during the 2016 election cycle.
- 4. To the best of our knowledge, the Advertisement was not created, produced, or distributed at the suggestion or request of HFA or its agents and HFA or its agents did not assent to the creation, production, or distribution of the Advertisement.
- 5. To the best of our knowledge, no employee or agent of Dixon/Davis working on the Advertisement had any involvement with HFA or its agents regarding the Advertisement in any way, including, but not limited to:
 - i. the content of the Advertisement;

- ii. the intended audience for the Advertisement;
- iii. the means or mode of the Advertisement;
- iv. the specific media outlet used for the Advertisement;
- v. the timing or frequency of the Advertisement; or
- vi. the duration of the Advertisement.
- 6. To the best of our knowledge, no employee or agent of Dixon/Davis working on the Advertisement had discussions with HFA or its agents about the Advertisement.
- 7. To the best of our knowledge, no employee or agent of Dixon/Davis in working on the Advertisement used or conveyed information about HFA's campaign plans, projects, activities, or needs to create, produce, or distribute the Advertisement.
- 8. To the best of our knowledge, no employee or agent of Dixon/Davis in working on the Advertisement used information previously used by Dixon/Davis in providing services to HFA in relation to the creation, production, or distribution of the Advertisement.

We declare under penalty of perjury that the foregoing is true and correct. Executed on this **22** day of December, 2016.

David Dixo

Richard I

Exhibit D

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES	PAGE 9 OF 9
(Schedule E)	FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full) DCCC	FEC IDENTIFICATION NUMBER ▼
	C C00000935
Check if 24-hour report 48-hour report New report Amends report file	d on There's Andrews
Full Name of Payee Old Towne Media	Date of Public Distribution/Dissemination
Date of Dissemination: 10/19/16 Mailing Address 4507 Penwood Dr	10 19 2016
	Amount
City State Zip Code	48000.00
Alexandria • VA 22310	Transaction ID : SE-952383 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy Category/ Type 004	10 18 2016
Name of Federal Candidate Support Office	e Sought: House District: 00_
Donald J. Trump Oppose	President Senate State:
Calendar Year-To-Date Per Election for Office Sought 2742321.20 Disb 2016	ursement For: Primary ⊠ General Other (specify) ▶
Full Name of Payee	Date of Public Distribution/Dissemination
AL Media, LLC Date of Dissemination: 10/19/16	المحققة المناما العثنوا البنتها
Mailing Address 222 West Ontario West	
Suite 600	Amount
City State Zip Code	81321.00
Chicago IL 60654	Transaction ID : SE-952867 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy Category/ Type O04	10 14 2016
Name of Federal Candidate Support Office	e Sought: House District: 00
Donald J. Trump Oppose	President Senate State:
Calendar Year-To-Date Per Election for Office Sought 2742321.20 2016	ursement For: Primary General General Other (specify) ▶
(a) SUBTOTAL of Itemized Independent Expenditures	129321.00
(b) SUBTOTAL of Unitemized Independent Expenditures	e que que pera pera pera pera pera se esta en la compansa de la co
(c) TOTAL Independent Expenditures	273146.39
Under ponelty of perjury I certily that the independent expenditures reported herein were not me with, or at the request or suggestion of, any candidate or authorized committee or agent of either party committee) any political party committee or its agent.	ade in cooperation, consultation, or concert in, or (if the reporting entity is not a political
Kelly C. Ward	0 21 2016
Signature	انده پدیما اد از د

24/48 HOUR REPORT OF INDEPENDENT EXPENDITUR	RES	[5:05 to 05 60
(Schedule E)		FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full)	F	EC IDENTIFICATION NUMBER V
DCCC	[F	C C00000935
	<u> </u>	C3 C00000333
Check if 24-hour report 348-hour report New report	Amends report filed on	
Full Name of Payee Screen Strategies Media, LLC Date of Dissemination: 10/24/16	Fire	Public Distribution/Dissemination 24 2016
Mailing Address 11150 Fairfax Blvd	1.3	المستشما لتال
Suite 505	Amount	
City State Zip C		45000.00
Fairfax VA 2203		tion IO : SE-952072 Disbursement or Ohligation
Purpose of Expenditure Media Buy Cate	egory/ Type 004	
Name of Federal Candidate	Support Office Sought:	House District: 00
Donald J. Trump	Oppose President	Senate State:
Calendar Year-To-Date Per Election for Office Sought 3653174	4.61 Disbursement F	For: Primary General ar (specify)
Full Name of Payee		Public Distribution/Dissemination
AL Media LLC	1-0-	THE PROPERTY AND A STREET
Date of Dissemination: 10/24/16 Mailing Address 222 W Optatio St	<u> </u>	0 24 2016
TAL W ONIBIO O	Amount	
Suite 600 City State Zip C	Codo.	131250.00
Chicago IL 606	54 Transact	lon ID : SE-953187 Disbursement or Obligation
Purpose of Expenditure Media Buy Cate	egory/ 004 10	المستحمدها المصفعا الم
Name of Federal Candidate	Support Office Sought:	House District: 00
Donald J. Trump	Oppose President	Senale State:
Calendar Year-To-Date Per Election for Office Sought 365	Disbursement F 2016	For: Primary X General
المناب المدار المساسمان ال	Othe	er (specify) >
(a) SUBTOTAL of Itemized Independent Expenditures		176250.00
(b) SUBTOTAL of Unitemized Independent Expenditures		
	F ==+	
(c) TOTAL Independent Expenditures		- <1 (& d)
Under penalty of perjury I certify that the independent expanditures report with, or at the request or suggestion of, any candidate or authorized commparty committee) any political party committee or its agent.		
Keily C. Ward	# 150 g 1 1 n	On the state of the state of the
Signature	Oate 10	25 2016

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES	T0405 54 05 00
(Schedule E)	PAGE 51 OF 60 FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full)	IDENTIFICATION NUMBER Y
DCCC	C00000935
Check If 24-hour report 48-hour report New report Amends report filed on	1 0.4.9.1 LAAAAAAA
AL Media LLC	
Date of Dissemination: 10/25/16 10 Mailing Address 222 W Ontario St	25 2016
Suite 600	
City State Zip Code	9000.00
Date of Dis	n ID : SE-953228 bursement or Obligation
Purpose of Expenditure Media Buy Category/ Type 10	24 2016
Name of Federal Candidate Sought:	House District: 00
Oppose Oppose President	Senate State:
Calendar Year-To-Date Per Election for Office Sought A369947.93 Disbursement For: 2016 Other (s	Primary ⊠ General
	olic Distribution/Dissemination
Canal Partners Media, LLC Date of Dissemination: 10/25/16	25 2016
Mailing Address 25 Whitlock Place - Amount	i
Suite 200	6-0-3-46 -49 -4 -44-44-44-4
City State Zip Code	184082.00
Date of Dis	ID : SE-952497 bursement or Obligation
Purpose of Expenditure Media Buy Category/ Type Category/ Type	19 2016
Name of Federal Candidate Support Office Sought:	House District:00
Denald J. Trump Oppose President	Senato State:
Calendar Year-To-Date Per Election for Office Sought A369947.93 Other (c	Primary (X) General specify) >
(a) SUBTOTAL of Itemized Independent Expenditures	193082.00
(b) SUBTOTAL of Uniternized Independent Expenditures	ومرسوب مرسوب والمدود
(c) TOTAL Independent Expenditures	مراد المستوانسية وهيئة مدالات المراد
Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooper with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reparty committee) any political party committee or its agent.	ation, consultation, or concert porting entity is not a political
Kelly C. 3Fard Date 10 25	2016
Signature	

	ORT OF INDEPENDEN	IT EXPEND	ITURES		PAGE 23 OF 23
(Schedule E)			· · · · · · · · · · · · · · · · · · ·		FOR SE OF FORM 24/48
NAME OF COMMITTEE	Ē (in:Fuli)				FEC IDENTIFICATION NUMBER V
					C C00000935
Check if 24-hour n	eport 48-hour report	New rep	ort Amends repo	ort filed o	المي م ، المنده ، المعادن المع
Full Name of Payes Moore Camp					Date of Public Distribution/Dissemination
Mailing Address 44	7 Irving St, NW			7,	10 28 2016 Amount
City	~ ~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~	State	Zip Code	——	4472.38
Washington		DC	20010		Fransaction ID : SE-954234 Date of Disbursement or Obligation
Purpose of Expendi Mail Services	lure		Category/ 000		10 27 2016
Name of Federal Co	andidate		Support	Office S	Sought: House District: 00
Donald J. Trump			Oppose	⊠ P	resident Senate State:
Calendar Year- Per Election fo	To-Date r Office Sought	45	93586.81	Diaburs 2016	oment For: Primary General Other (specify) ▶
Full Name of Payer	·			\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	Deto of Public Distribution/Dissemination
AL Media LLC					10 1 28 2016
Mailing Address	222 W Ontario St			7	E
	Suite 600			1	
Cily Chicago		State IL	Zip Code 60654		30525.00 ! ansaction ID : SE-953928 Date of Disbursement or Obligation
Purpose of Expendi Media Buy	ture .	· · · · · · · · · · · · · · · · · · ·	Category/ 004		10 26 2016
Name of Federal Co	andidate .	 	Support	Office S	lought: House District: 00
Donald J. Trump		·	Oppose	X P	resident Senate State:
Calendar Year- Per Election to	To-Date Office Sought	- gas agrigation	4593586.81	Disburse 2016	ement For: Primary General Other (specify) >
(a) SUBTOTAL of Ite	emized independent Expenditure	95,		•	34997.36
(b) SUBTOTAL of Ur	nitemized independent Expendit	ur o s		•	
(c) TOTAL Independe	ent Expenditures		,	•	1588663.18
with, or at the reques		te or authorized			in cooperation, consultation, or concert or (if the reporting antity is not a political
Kelly C.	Ward		Date	10	29 2016
			<u> </u>		

(c) TOTAL Independent Expenditures......

Signatu

image# 201610319037014651 24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES PAGE OF 8 (Schedule E) FOR SE OF FORM 24/48 NAME OF COMMITTEE (In Full) FEC IDENTIFICATION NUMBER ▼ DCCC C00000935 Check if 24-hour report 48-hour report X New report Amends report filed on Full Name of Payee Date of Public Distribution/Dissemination Adelstein & Associates LLC Date of Dissemination: 10/31/16 2016 Mailing Address 222 West Ontario Street, Suite 600 **Amount** City State Zip Code 80000.00 IL 60654 Transaction ID: SE-954371 Chicago Date of Disbursement or Obligation Purpose of Expenditure Category/ Media Buy 004 28 2016 Type Name of Federal Candidate 00 Support Office Sought: House District: Trump, Donald, J.,, Oppose * President Senate State: Disbursement For: ★ General Primary Calendar Year-To-Date 4979620.65 2016 Per Election for Office Sought Other (specify) ▶ Full Name of Payee Date of Public Distribution/Dissemination Adelstein & Associates LLC Date of Dissemination: 10/31/16 2016 10 31 Mailing Address 222 West Ontario Street, Suite 600 Amount City State Zip Code 67387.50 IL 60654 Transaction ID : SE-954372 Chicago Date of Disbursement or Obligation Purpose of Expenditure Category/ Media Buy 004 28 2016 10 Туре Name of Federal Candidate Support Office Sought: House District: _ 00 Trump, Donald, J.,, Oppose | X | President Senate State: Disbursement For: **Primary** ★ General Calendar Year-To-Date 4979620.65 2016 Per Election for Office Sought Other (specify) ▶ (a) SUBTOTAL of Itemized Independent Expenditures. 147387.50 (b) SUBTOTAL of Unitemized Independent Expenditures

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.

.Ward, Kelly, C., ,	[Electronically Filed]	Date	10	31	2016
re			Benedicted	المبيشيسة	Terrest Consultation of Consul

24/48 HOUR REPORT OF INDEPENDE (Schedule E)	INT EXPEN	DITURES	PAGE 51 OF 52
·			FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full) DCCC			FEC IDENTIFICATION NUMBER ▼
			C C00000935
Check if 24-hour report 248-hour report	X New n	eport Amends repo	ort filed on
Full Name of Payer Screen Strategies Media, LLC			Date of Public Distribution/Dissemination
Date of Dissemination Mailing Address 11150 Fairfax Blvd	1: 10/18/16		10 . 18 2016
Suite 505			Amount
City	State	Zip Code	134898.50
Fairfax	VA	22030	Transaction ID : SE-952377 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy		Category/ 004	10 11 2016
Name of Federal Candidate		Support	Office Sought: House District: 00
Donald J. Trump	- ·	Z Oppose	President Senate State:
Calendar Year-To-Date Per Election for Office Sought	, ;	, 2613000.20	Disbursement For: Primary General 2016 Other (specify) ▶
Full Name of Payee Kully Hall, LLC Date of Dissemination Mailing Address 1932 1st Ave Suite 203	n: 10/18/16		Date of Public Distribution/Dissemination
Mauring Address 1932 1st Ave, Suite 203	:		Amouni
City	State	Zip Code	6225,00
Scattle	WA	98101	Transaction ID : SE-952379 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy Media Production		Category/ Type	10 18 2016
Name of Federal Candidate		Support	Office Sought: ! House District: 00 ·
Donald J. Trump		X. Oppose	President Schate State:
Calendar Year-To-Date Por Election for Office Sought	, ',	2613000.20	Disbursement For: Primary General 2016 Other (specify) ▶
(a) SUBTOTAL of Hemized Independent Expendi			
(b) SUBTOTAL of Unitemized Independent Exper	ıdilures	Waship to a Slidens Conacción de várica con con est a c	· • .
(c) TOTAL Independent Expenditures		·::	•
Under penalty of perjury I certify that the independent, or at the request or suggestion of, any cand party committee) any political party committee or	idate or authorize	s reported herein were ed committee or agent o	not made in eqoperation, consultation, or concert of either, or (if the reporting entity is not a political
Kelly C. Ward			
Signature		Date	, 10 19 2016

24/48 HOUR REPORT OF INDEPENDE (Schedule E)	NT EXPE	ENDITURES		PAGE 48 OF 60
· · · · · · · · · · · · · · · · · · ·			·····	FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full) DCCC			FEC I	DENTIFICATION NUMBER V
· · · · · · · · · · · · · · · · · · ·			C	C00000935
Check if 24-hour report : 48-hour report	X: Nev	w report , _	ort filed on	E t . + * * * *
Full Name of Payee Screen Strategies Media, LLC		•	Date of Publ	c Distribution/Dissemination
Date of Dissemination	: 10/24/16		10	Ž4 2016 ⁷
Mailing Address 11150 Fairfax Blvd Suite 505			Amount	
City	State	Zip Code		45000.00
Fairfax	VA	22030		ID : SE-952072 ursement or Obligation
Purpose of Expenditure Media Buy	•	Category/ Type 004	10	17 2016
Name of Federal Candidate		Support	Office Sought:	House District: 00
Donald J. Trump		:X: Oppose	· -	Senate State:
Catendar Year-To Date Per Election for Office Sought	,	3653174.61		Primary IX Ganoral
Full Name of Payee			Cata of Bubil	c Distribution/Dissemination
AL Media LLC Date of Dissemination	: 10/24/16		1	24 2016
Malling Address 222 W Ontario St				2. 20.0
Suite 600			Amount	
City	State	Zip Code		131250.00
Chicago	l,	60654	Transaction II	D : SE-953187 ursement or Obligation
Purpose of Expenditure Media Buy	.	Category/ 004	"10"	21 2016
Name of Federal Candidate		Support	Office Sought:	House District: 00
Donald J. Trump	<u> </u>	Oppose	:X: President	Senale State:
Calendar Year-To-Date Per Election for Office Sought	3	3653174.61	Disbursement For: 2016: Other (s	Primary X General
(a) SUBTOTAL of Itemized Independent Expenditu (b) SUBTOTAL of Unitemized Independent Expen			, "	176250.00
(b) CODYO INE C. CIMOINECC INCOPCINGUE CAPEL			. •	,
(c) TOTAL Independent Exponditures			· • · · ,	
Under penalty of perjury I certify that the indepen with, or at the request or suggestion of, any candle party committee) any political party committee or it	date or autho	tures reported herein were trized committee or agent o	not made in cooperal of either, or (if the repo	ion, consultation, or concert orting entity is not a political
Kelly C. Wurd	•		, 4 1 4	
The second secon		Date	10 25	2016
Signature				

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES	PAGE 52 OF 60
(Schedule E)	FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full)	FEC IDENTIFICATION NUMBER ▼
DCCC	C C00000935
Check if 24-hour report 48-hour report New report Amends report	filed on .
Full Name of Payee Screen Strategies Media, LLC	Oate of Public Distribution/Olssemination
Date of Dissemination: 10/25/15	10 25 2016
Mailing Address 11150 Fairfax Blvd Suite 505	Amount
City State Zip Code	· 64326.00
Fairfax . VA 22030	Transaction ID : SE-953184 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy Category/ Type 004	10 21 2016
Name of Federal Candidate Support	Office Sought: House District: 00
Donald J. Trump X: Oppose	X President Senate State:
Calendar Year-To-Date Per Election for Office Sought 4369947.93	Disbursement For: Primary General
ref Election is dince dutyin	: Other (specify) >
Full Name of Payes Buying Time, LLC Date of Dissemination: 10/25/16	Date of Public Distribution/Dissemination
Mailing Address 650 Massachusetts Avenue, NW	
Suite 210	Amount
City State Zip Code	. 62488.00
Washington DC 20001	Transaction ID : SE-953185 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy Category/ Type 004	10 21 2016
Name of Federal Candidate Support	Office Sought: House District: 00
Donald J. Trump X: Oppose	:X! President Senato State:
Calendar Year-To-Date Per Election for Office Sought 4369947.93	Disbursement For: Primary
(a) SUBTOTAL of Itemized Independent Expenditures	126814.00
(b) SUBTOTAL of Uniternized Independent Expenditures	
(c) TOTAL Independent Expenditures	, ,
Under penalty of perjury I certify that the independent expenditures reported herein were no with, or at the request or suggestion of, any candidate or authorized committee or agent of e party committee) any political party committee or its agent.	of made in cooperation, consultation, or concert either, or (if the reporting entity is not a political
Kells C. Wurd	10 25 2016
Signature	

	48 HOUR REPORT OF INDEPENDE	NT EXPEN	IDITURES	i		-	PAGE 8	OF 8
(Sc	hedule E)			•				F FORM 24/48
NA	ME OF COMMITTEE (In Full)					EEC		ON NUMBER Y
	CCC				•	1 _		ON NUMBER Y
	•					I C	C00000935	
<u> </u>								
Che	eck il 🔀 24-hour report 💢 48-hour report	X Naw	report A	mands repo	ort Med	on		•
1	Full Name of Payee				i	Date of Pub	llo Distribution	Dissemination
··	Screen Strategies Media, LLC	•			-	Date of Pub	iic Oistribuligh	Oissemination
	Date of Dissemination	: 10/31/16				10	31"	2016
ı	Mailing Address 11150 Fairfax Blvd					Amount	•	
ł	Suite 505					7111-00-11		
- [.Gly	State	Zip Code					55000.00
- {	Fairfax ·	VA	22030			Transaction	ID : SE-9532 Jursement or (93
ľ	Purpose of Expenditure		l Catanaa					-
- 1	Media Buy		Category			10	25	2016
	Name of Federal Candidate		_ 					
ı				Support	ı		House	District: 00
- 1	Donald J. Trump		X	Oppose	LX.	President	Senate	State:
- 1	Calendar Year-To-Date				Disbu	ırsement For:	Priman	General
į	Per Election for Office Sought	:	4979620.65		2016	Other (s	pecify) >	
Ī	Full Name of Payee .							/Dissemination
ł	AL Media LLC				- 1	n 2		
-	Date of Dissemination	: 10/31/16				10	31	2016
ı	Mailing Address 222 W Ontario SI				1	Amount		
1.	Suite 600					,		
- 1	City	State	Zip Code		1	· !		115875.00
ļ	Chicago	IL	, 60654			Transaction Date of Dist	ID : SE-95417 Duisement or (8 Oblication
- 1	Purpose of Expenditure		Category	/		"10"	³ 27 ⁵ ′	. , , ,
- 1	Media Buy		Тур	004		10	27	2016
ł	Name of Federal Candidate		 -	Support	انسنا	Sought:	House	District: 00
- 1	Donald J. Trump		ベン			-		
].			· <u>``</u>	Oppose		President	Senate	State:
-	Calendar Year-To-Date	-	4979620	RE	Disbi 2016	ursement For:	Primary	General .
	Per Election for Office Sought	3	4373020			Otner (s	pecify) >	
		.,		•				
(a) SUBTOTAL of Itemized Independent Expendit	ıres	************			,		170875.00
	·					•	•	
(b) SUBTOTAL of Uniternized Independent Expen	ditures			. •			
						•	•	
(c) TOTAL Independent Expenditures			••••				433711.75
					,	•	,	
								
Ų	Inder penalty of perjury I certify that the indepen	dent expenditu	es reported t	erein were	not me	de in coopera	ition, consulta	tion, or concert
	rith, or at the request of suggestion of, any candi early committee) any political party committee or it		ten committee	or agent o	n eine	i, or the riet	orang sumy t	a not a politicat
_	_ ,	-a- ···-						
	Kelly C. Ward			_	**	, · · · · ·	• •	`
	Signature	· ·		Date	1	0 31	201	v

Image# 201611049037121060 24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES (Schodule E)

(Sc	chedule E)	•		PAGE 10 OF 11 FOR SE OF FORM 24/48
	ME OF COMMITTEE (In Full) OCCC			FEC IDENTIFICATION NUMBER V
Ch	eck if 🗷 24-hour report 🗌 48-hour	report New	report Amends repo	rt filed on
	Full Name of Payee Screen Strategies Media, L Date of Diss	LC emination: 11/04/16		Date of Public Distribution/Dissemination
	Mailing Address 11150 Fairfax Blvd			hand beind beamend
	Suite 505			Amount
	City Fairfax	State : VA	Zip Code 22030	Transaction ID : SE-954176 Date of Disbursement or Obligation
	Purpose of Expenditure Media Buy		Category/ Type 004	10 / 27 / 2016
	Name of Federal Candidate		Support	Office Sought: House District: 00
	Trump, Donald, J., ,	•	x Oppose	President Senate State:
	Calendar Year-To-Date Per Election for Office Sought	مورسوس وسوس	6419383,70	Disbursement For: Primary General 2016
	Full Name of Payee AL Media LLC Date of Diss	emination: 11/04/16		Date of Public Distribution/Dissemination
	Mailing Address 222 W:Ontario St Suite 600		<u> </u>	Amount
	City	State	Zip Code	3750.00
	Chicago	IL	60654	Transaction ID: SE-954988 Date of Disbursement or Obligation
1	Purpose of Expenditure Media Buy	•	Catégory/ Type 004	11 04 2016
	Name of Federal Candidate	· · · · · · · · · · · · · · · · · · ·	Support	Office Sought: House District: 00
ı	Trump, Donald, J., ,			Fresident Senate State:
	Calendar Year-To-Date Per Election for Office Sought		6419383.70	Disbursement For: Primary K General 2016 Other (specify)
	(a) SUBTOTAL of Itemized Independent	Expenditures		43750.00
	(b) SUBTOTAL of Unitermized Independent	ent Expenditures		
	(c) TOTAL Independent Expenditures			
,	Under penalty of perjury I certify that the with, or at the request or suggestion of, party committee) any political party comm	any candidate or authori	res reported herein were ized committee or agent o	not made in cooperation, consultation, or concert felther, or (if the reporting entity is not a political .
	Ward, Kelly. C	/Elect	ronically Filed Date	11 04 2016
	Signature			

Image# 201611049037121059 24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES (Schodule E)

Schedule E) .	PAGE 9 OF 11 FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full) DCCC	FEC IDENTIFICATION NUMBER V
Check if 🗷 24-hour report 🗌 48-hour report 🔪 🗶 New report 🔲 Amends report file	q ou man (
Full Name of Payee Screen Strategies Media, LLC Date of Dissemination: 11/04/16	Date of Public Distribution/Dissemination
Mailing Address 11150 Feirfex Blvd Suite 505	Amount
City . State Zip Code Fairfax . VA 22030	13000.00 Transaction ID : SE-954882 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy Category/ Type O04	11 03 2016
	ce Sought: House District: 00 President Senate State:
Calendar Year-To-Date Per Election for Office Sought Dist	oursement For: Primary
Full Name of Payee The New Media Firm, Inc. Date of Dissemination: 11/04/16	Date of Public Distribution/Dissemination
Mailing Address 1730 Rhode Island Ave., NW Suite 213	Amount
City State Zip Code Washington DC 20036	Transaction ID : SE-954883 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy Category/ Type 004	11 03 2016
Trump Secret 1	ce Sought: House District: 00 President Senate State:
	bursement For: Primary K General Other (specify)
(a) SUBTOTAL of Itemized Independent Expenditures	59000.00
(b) SUBTOTAL of Unitemized Independent Expenditures	
(c) TOTAL Independent Expenditures	And the Printer and Production of the State
Under penalty of perjury I certify that the Independent expenditures reported herein were not rewith, or at the request or suggestion of, any candidate or authorized committee or agent of eith party committee) any political party committee or its agent.	nade in cooperation, consultation, or concert er, or (if the reporting entity is not a political
Ward, Kelly, C., . [Electronically Filed] Date	11 04 2016
g	

Image# 201612089039916524

SCHEDULE E (FEC Form 3X) ITEMIZED INDEPENDENT EXPENDITURES

EMIZED INDEPENDENT EXPENDITURES	;					024 OF 109107 . 24 OF FORM 3X .
AME OF COMMITTEE (In Full)				FEC II		ION NUMBER Y
DCCC				С	C0000093	•
heck it 24-hour report 48-hour report	New rep	orl Amends repo	n tiled o	l		<u></u>
<u>, </u>						
Full Name of Payee Screen Strategies Media, LLC Date of Dissemination: 11/07/16 - 24 hours prior to	eleclion day	, Memo	llem	Date of Publi	ic Olstribution	/Dissemination 2016
Mailing Address 1'l 150 Fairfax Blvd				••	•	20.0
Suite 505				Amount		j
City	State	Zip Code				38173.50
Fairfox	. VA	22030		Transaction Date of Disbu	ID : SE-9546 ursement or (44 Obligation
Rumosc of Experidilure Media Buy		Category/ Type 004		. 11	01 .	2516
Name of Federal Candidate:		Support	Office	Sought:	House	District:
Trump, Donald, J., ,		y Oppose		President	Senale _.	State:
Calendar Year To-Oate Per Election for Office Sought		6693372.69	Disbur 2016		: : Primar	y '× General
Full Name of Payee The New Media Firm, Inc.		Memo	Itern	Date of Publi	-	/Dissemination
Date of Dissemination: 11/01/16 Mailing Address 4720 Chada Island Avg. Appl				11	יום '	2016
1730 Knode Island Ave., INV				Атюшен		
Suite 213	State	Zip Code				3566.00
Washington	DC	20036		Transaction Date of Disb		i43
Purpose:of Expanditure Media Production		Calegory/ Type 004		11	01	2016
Name of Federal Candidate:		Support	Office	Sought:	House	District:
Trump, Donald, J.,		x. Oppose	×.	President	Senate	State:
Calendar Year-To-Date Per Election for Office Sought		6693372.69	2016		•	y K General
		<u>-</u>		Other (s)	pecify) ▶	41700 50
(a) SUBTOTAL of Itemized Independent Expenditures		44 64 0+4 0+4 0+4 0+4 0+4 0+4 0+4 0+4 0+4 0+	•			41739.50
(a) SUBTOTAL of Uniternized Independent Expenditu	fes . , ,		>			
(a) TOTAL Independent Expenditures			•			
Under penalty of perjury I certify that the independent with, or at the request or suggestion of, any candidaparty committee) any political party committee or its	ate or authorized	reported herein were committee or agent of	not made of either,	de in coopera , or (if the rep	ation, consults	ation, or concert is not a political
•	/Electronically Fil	led) Date	12	08	50	16
Signature						

FEC Schedule E (Form 3X) Rev 05/2016

	1/48 HOUR REPORT OF INDEPENT	DENT EXPEN	DITURES			PAGE 51	OF 52
10	chedule E)						FORM 24/48
	ME OF COMMITTEE (In Full)				1 FEC	IDENTIFICATION	ON NUMBER T
ַ	occc ·				С	C00000935	
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đ	neck if 24-hour report 48-hour report	New 1	eport Amends rep	ort filed	i on	, u -	
	Full Name of Payee			1	Date of Put	dic Olstribution	Dissemination
	Screen Strategies Media, LLC. Date of Disseminat	ion: 10/18/16			·• " 10"	- Ն Ո 18	2016
	Malling Address 11150 Fairfax Blvd			,	Amount		
	Suite 505	_		{	Amogra		
	City	State	Zip Code				134898.50
	Fairlex	VA	22030) n 10.: SE-95237 bursement or C	
	Purpose of Expenditure Media Buy		Category/ Type 004		້ 10	5 r 11	2016
	Name of Federal Candidate		Support	Office	Sought:	House	District:00
	Donald J. Trump		X Oppose	1	. President	Senale	State:
				Oinn.		Orimani	
	Calendar Year-To-Date Per Election for Office Sought	. 1	2613000.20	2016	Other (soeciívi >	· General
	Full Name of Payee			<u> </u>	Date of Pul	olic Distribution/	Dissemination
- 1	Kully Hall, LLC						v '. , -
	Date of Disseminal	ion: 10/18/16			10	18	2015
	Mailing Address 1932 1st Ave. Suite 203				Amount		
	City	Slate	Zip Code				6225.00
	Seattle	WA	98101			ID : SE-952379 bursement or C	•
-	Purpose of Expenditure		Category/		1		-
	Media Buy Media Production		Туре	,	"10" !	18	2016
	Name of Federal Candidate		Support	Offic	e Sought:	House	District:00
	Oonald J. Trump		💢: Oppose	iΧ	Presideni	- Senate	State:
	Calendar Year-To-Date			Disb	ursement For:	Primary	X General
	Per Election for Office Sought	3	2613000.20	2010		specily) 🕨	
Г		استدري المنابع والمنافق في المنافق في المناف					
	(a) SUBTOTAL of Itemized Independent Expen	iditures		▶			141123.50
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	(b) SUBTOTAL of Uniternized Independent Exp	oenditures	, ,				•
	.,		•			•	
	(c) TOTAL Independent Expenditures			··· >	•		
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	Under penalty of perjury I certify that the inder with, or at the request or suggestion of, any caparty committee) any political party committee of	indidate or authoriz	es reported herein were ted committee or agent	not ma	ade in cooper r, or (if the re	ation, consultat	ion, or concert not a political
	Kelly C. Word		_	v .	,, .	*	
	Signature	1 p 11 (- 540 TO	Oate	6 I	0 19	201	0
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Image# 201610139032426300 24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES (Schedule E)

Schedule E)	PAGE 3 OF 3 FOR SE OF FORM 24/48
VAME OF COMMITTEE (In Fuil) DCCC	FEC IDENTIFICATION NUMBER ▼ C 1 00000935
Check if 24-hour report 48-hour report New report Amends report file	ed on and a second second
Full Name of Payee Buying Time, LLC Date of Dissemination: 10/11/16	Date of Public Distribution/Dissemination
Mailing Address 650 Massachusetts Avenue, NW Suite 210	Amount
City State Zip Code	£3500 00
Washington DC 20001	757500.00 Transaction ID : SE-951439 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy Catogory/ Type Catogory/	10 11 2016
Name of Federal Candidate Support Offi	ice Sought: House District: 00
	President Senate State:
Calendar Year To-Date Per Election for Office Sought 1459931.62 201	bursoment For: Primary X Genoral 6 Other (specify) >
Full Name of Payee Screen Strategies Media, LLC Date of Dissemination: 10/12/16	Date of Public Distribution/Dissemination
Mailing Address 11150 Fairfax 8lvd	Aniount
Suite 505 City State Zip Code	74632.00
City State Zip Code Falrfax VA 22030	Transaction ID : SE-951438 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy Category/ Type Category/ Type	10 11 2016
Name of Federal Candidate Support Off	ice Sought: House District: 00
Trump, Donald, J., .	President Senato State:
Calendar Year-To-Date Per Election for Office Sought Dis 20	bursement For: Primary Goneral Other (specify)
(a) SUBTOTAL of Itemized Independent Expenditures	132132.00
(b) SUBTOTAL of Unitemized Independent Expenditures	The same of the sa
(c) TOTAL Independent Expenditures	170032.00
Under penalty of perjury I certify that the independent expenditures reported herein were not with, or at the request or suggestion of, any candidate or authorized committee or agent of elit party committee) any political party committee or its agent.	made in ecoperation, consultation, or concert ner, or (if the reporting entity is not a political
Ward. Kelly. C [Electronically Filed] Date	10 13 2016
Signature	

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES (Schedule E)	PAGE 17 OF 17
NAME OF COMMITTEE II. C.III.	FOR SE OF FORM 24/48
DCCC	C00000935
Check if 24-hour report 48-hour report New report Amends report filed on 1	(0 T 0) () 'Y
Full Name of Payer Screen Strategies Media, LLC Date of Dissemination: 10/20/16 Date of Public 10	Distribution/Dissemination
Mailing Address 11150 Fairfax Blvd Suite 505	the accordance of the case of the
City State Zip Code Fairfax VA 22030 Transaction	107040.00 D: SE-952389
Division of Consults and	rsement or Obligation
Name of Federal Candidate Support Office Sought: Oppose Name of Federal Candidate	House District: 00
Calendar Year-To-Date Per Election for Office Sought 2989611.20 Disbursement For: 2016 Other (spir	Primary General
	: Distribution/Dissemination
Mailing Address 222 W Onterio St Amount Suite 600	المستدادة المستدادة
City State Zip Code Chicago IL 60654 Transaction ID	140250.00 : SE-952071
	17 2016
Name of Federal Candidate Support Office Sought:	House District: 00
Calendar Year-To-Date Per Election for Office Sought Coppose Cop	Senate State:
(a) SUBTOTAL of Itemized Independent Expenditures	247290.00
(b) SUBTOTAL of Unitemized Independent Expenditures	652070.38
Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the ropo party committee) any political party committee or its agent.	on, consultation, or concert rting entity is not a political
Kelly C. Ward Date 10 21 Signature	2016

	18 HOUR REPORT OF INDEPENDENT E	XPENDI	TURES			PAGE 15 OF 18	5
(Sci	nedule E) 					FOR SE OF FORM 24/48	
	IE OF COMMITTEE (In Full)				FEC	IDENTIFICATION NUMBER	7
יט	CCC				C.	C00000935	
Che	ck if X 24-hour report 48-hour report	New repo	ort Amends repo	ort filed	ou . م م.	1 E C 1 1 LA . A A.	~
_		<u> </u>				. با مواد المحاد المحاد	
	Full Name of Payee Prism Communications, Inc. Date of Dissemination: 10/27/	16		1		tic Distribution/Dissemination	n Y
ı	Mailing Address 1000 Potomac Street, NW					* *	
I	Suite 420			-	Amount		. .
Ī	City Stat	te	Zip Code			3291.5	8 (
į	Washington OC	:	20007		Transaction	ID: SE-953927 pursement or Obligation	_
	Purpose of Expenditure Media Production		Category/ 004		10,	26 1 2016	- -
Ī	Name of Federal Candidate		Support	Office	Sought:	House District: 00)
1	Donald J. Trump		Oppose	X	President	Senato State:	
	Calendar Year-To-Date Per Election for Office Sought	45 45	50355.45	Disbu 2016	rsement For:	Primary X Gene	eral .
	Full Name of Payee 76 Words Corp. Date of Dissemination: 10/26/	16			Date of Pub * u* * u 10	lic Distribution/Dissemination	ָרְיַרְי
	Mailing Address 1121 5th St. NW				Amount	- to	-
L	Floor#1						
١	City Sta Washington Do	-	Zip Code 20001			5500.00 ID: SE-954171 bursement or Obligation	41
	Purpose of Expenditure Media Production		Cetegory/ 004	-		27 2016	[4]
Ī	Name of Federal Candidate		Support	Office	Sought:	House District: 00	0
	Denald J. Trump		Oppose	X	President	Senate State:	
	Calendar Year-To-Date Per Election for Office Sought	∓=- (4 - 46 - 4	4436718.92	Disbu 2016		Primary X Gene	enal
	· · · · · · · · · · · · · · · · · · ·				٠	The second secon	m 4
(a) SUBTOTAL of Itemized Independent Expenditures		,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	·· •	٠ _,	8791.58 	_
ı	o) SUBTOTAL of Unitemized Independent Expenditures.			·· •		and the second seco	
		•				همان المواهد ا المواهد المواهد	
(TOTAL Independent Expenditures	4,164197,77	······································	" b	انيس عيد	771178.77	'
w	nder penalty of perjury I certify that the independent ex ith, or at the request or suggestion of, any candidate or arty committee) any political party committee or its agent	authorized	reported herein were committee or agent of	not ma of either	ide in cooper r, or (If the re	ation, consultation, or conce porting entity is not a politic	ert ¢el
	Kelly C. Ward		_ Date		";;	2016	
1	Signature		_	-	-		. }

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES (Schedule E)	PAGE 22 OF 25
·	FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full) DCCC	FEC IDENTIFICATION NUMBER ▼
	C! C00000935
Check if 24-hour report 48-hour report New report Amends	report filed on
Full Name of Payee Kully Hall, LLC Date of Dissemination: 10/12/16	Date of Public Distribution/Dissemination
Mailing Address 1932 1st Ave. Suite 203	10 1 12 1 2010
	Amount
City State Zip Code	4297.00
Seattle WA 98101	Transaction ID : SE-951665 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy Media Production Category/ Type	10 14 2016
Name of Federal Candidate Suppo	rt Office Sought: Hause District: 00
Donald J. Trump Oppos	e President Senate State:
Calendar Year-To-Date Par Election for Office Sought	Disbursement For: Primary ☐ General 2016 ☐ Other (specify) ▶
Full Name of Payee	Date of Public Distribution/Dissemination
The New Media Firm, Inc. Date of Dissemination: 10/12/16	10 12 2016
Mailing Address 1730 Rhode Island Ave., NW	
Suite 213	Amount
City State Zip Code	56930.43
Washington DC 20036	Transaction ID : SE-951666 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy Category/ Type	10 1 12 2016
Name of Federal Candidate	orl Office Sought: House District: 00
Donald J. Trump Oppos	President Senato State:
Calendar Year-To-Date Per Election for Office Sought	Disbursement For: ☐ Primary ☐ General 2016 ☐ Other (specify) ▶
	(4)
(a) SUBTOTAL of Itemized Independent Expenditures	61227.43
(b) SUBTOTAL of Uniternized Independent Expenditures	
(c) TOTAL Independent Expenditures	و ما و خواصد ما معروب الها الما الدالم الما الما الما الما الما ا
Under penalty of perjury I certify that the independent expenditures reported herein with, or at the request or suggestion of, any candidate or authorized committee or age party committee) any political party committee or its agent.	· · · · · · · · · - · · · · · · · ·
	Dale 10 14 1 2016
Signature	

Image# 201610149032527772 24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES

Schedule E)	PAGE 21 OF 25 FOR SE OF FORM 24/48				
DCCC reg	C IDENTIFICATION NUMBER V				
	C00000935				
Check if 24-hour report	7, 6,00, 17,000				
Full Name of Payee The New Media Firm, Inc. Date of Dissemination: 10/12/16 Date of Payee 10					
Mailing Address 1730 Rhode Island Ave., NW					
Suite 213	and the desirable of the free several				
Washington DC 20036 Transacti	4047.25 ion (D : SE-951654 Disbursement or Obligation				
Purpose of Expenditure Media Buy Media Production Category/ Type	1 . 10 . 0 . 1 . 1				
Name of Federal Candidate Support Office Sought:	House District: 00				
Trump, Donald, J., .	Senate State:				
Calendar Year-To-Date Per Election for Office Sought Disbursement For 2016 Other	or: Primary General (specify)				
	Public Distribution/Dissemination				
Screen Strategies Media, LLC Date of Dissemination: 10/12/16	12 2016				
Mailing Address 11150 Fairfax Bivd Amount					
Suite 505	404050 00				
	121850.00 on ID : SE-951660 Disbursement or Obligation				
Purpose of Expenditure Media Buy Category/ Type Out Type	12 2016				
Name of Federal Candidate Support Office Sought:	House District: 00				
Trump, Donald, J., . Z Oppose Z President	Senate State:				
Calendar Year-To-Date Per Election for Office Sought Disbursement For 2016 Other	or: Primary 🗶 General				
ست خرن ع	entered in all the problems for income				
(a) SUBTOTAL of Itemized Independent Expenditures	125897.25				
(b) SUBTOTAL of Uniternized Independent Expenditures					
(c) TOTAL Independent Expenditures	27 - Andrew 1921				
Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.					
Ward, Kelly, C., [Electronically Filed] Date 10	2016				
Signature	·				

Image# 201610189033039655 24/48 HOUR REPORT OF IN (Schedule E)	DEPENDENT EXPENDITURES
NAME OF COMMITTEE (In Full) DCCC	

chedule E)	FOR SE OF FORM 24/48
ME OF COMMITTEE (In Full)	FEC IDENTIFICATION NUMBER ▼
CCC	Paralamenter Contractor of the con-
	C C00000935
eck if 24-hour report 🗷 48-hour report 🗎 New report 🗷 Amends report	filed on 10 14 2016
Full Name of Payee	Date of Public Distribution/Dissemination
The New Media Firm, Inc. Date of Dissemination: 10/12/16	10 12 2016
Mailing Address 1730 Rhode Island Ave., NW	India had had
Suite 213	Amount
City State Zip Code	4047.25
Washington . DC 20036	Transaction ID : SE-952372 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy Media Production Category/ Type	10 14 2016
Name of Federal Candidate Support	Office Sought: House District: 00
Trump, Donald, J., , Oppose	President Senate State:
	Disbursement For: Primary General Country C
Full Name of Payee	Date of Public Distribution/Dissemination
Screen Strategies Media, LLC Date of Dissemination: 10/12/16	10 12 2016
Mailing Address 11150 Fairfex Blvd	
	·
Suite 505	Amount
Suite 505 City State Zip Code	121850.00
City State Zip Code Fairfax VA 22030	hardware in the comment
City State Zip Code	121850.00 Transaction ID : SE-952373
City State Zip Code Fairfax VA 22030 Purpose of Expenditure Media Buy Category/ Type 004 Type Support	Transaction ID : SE-952373 Date of Disbursement or Obligation
City State Zip Code Fairfax VA 22030 Purpose of Expenditure Media Buy Category/ Type 004	Transaction ID : SE-952373 Date of Disbursement or Obligation
City State Zip Code Fairfax VA 22030 Purpose of Expenditure Media Buy Category/ Type 004 Type Support Trump, Donald, J., .	Transaction ID: SE-952373 Date of Disbursement or Obligation 10 121850.00 Transaction ID: SE-952373 Date of Disbursement or Obligation 10 10 14 2016 Office Sought: House District: 00
City State Zip Code Fairfax VA 22030 Purpose of Expenditure Media Buy Category/ Type 004 Name of Federal Candidate Support Trump, Donald, J Support Calendar Year-To-Date Per Election for Office Sought	Transaction ID: SE-952373 Date of Disbursement or Obligation 10 14 2016 Office Sought: House District: 00 President Senate State: Disbursement For: Primary & General 2016 Other (specify)
City State Zip Code Fairfax VA 22030 Purpose of Expenditure Media Buy Category/ Type 004 Name of Federal Candidate Support Trump, Donald, J., Oppose Calendar Year-To-Date	Transaction ID: SE-952373 Date of Disbursement or Obligation 10 14 2016 Office Sought: House District: 00 President Senate State: Disbursement For: Primary & General 2016 Other (specify)
City State Zip Code Fairfax VA 22030 Purpose of Expenditure Media Buy Category/ Type 004 Name of Federal Candidate Support Trump, Donald, J Support Calendar Year-To-Date Per Election for Office Sought	Transaction ID: SE-952373 Date of Disbursement or Obligation 10 14 2016 Office Sought: House District: 00 President Senate State: Disbursement For: Primary & General 2016 Other (specify)
City State Zip Code Fairfax VA 22030 Purpose of Expenditure Media Buy Category/ Type 004 Name of Federal Candidate Support Trump, Donald, J., Oppose Calendar Year-To-Date Per Election for Office Sought 1856586.80 (a) SUBTOTAL of Itemized Independent Expenditures	Transaction ID: SE-952373 Date of Disbursement or Obligation 10 14 2016 Office Sought: House District: 00 President Senate State: Disbursement For: Primary & General 2016 Other (specify)
City State Zip Code Fairfax VA 22030 Purpose of Expenditure Media Buy Category/ Type 004 Name of Federal Candidate Support Trump, Donald, J., Oppose Calendar Year-To-Date Per Election for Office Sought 1856586.80 (a) SUBTOTAL of Itemized Independent Expenditures (b) SUBTOTAL of Unitemized Independent Expenditures	Transaction ID: SE-952373 Date of Disbursement or Obligation
City State Zip Code Fairfax VA 22030 Purpose of Expenditure Media Buy Category/ Type 004 Name of Federal Candidate Support Trump, Donald, J., Coppose Calendar Year-To-Date Per Election for Office Sought 1856586.80 (a) SUBTOTAL of Itemized Independent Expenditures	Transaction ID: SE-952373 Date of Disbursement or Obligation

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES	<u> </u>
(Schedule E)	PAGE 3 OF 3 FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full)	FEC IDENTIFICATION NUMBER ▼
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	Control of the state of
Check if 24-hour report 48-hour report New report Amends report filed on	المستد عدا السنا المستد
	e of Public Distribution/Dissemination
Buying Time, LLC Date of Dissemination: 10/11/16	10 11 2016
Mailing Address 650 Massachusetts Avenue, NW	
Suite 210	ک جینگرد سال جدیات سینگست مال جنداش: "عالات نما
City State Zip Code	57500.00
Washington DC 26001 Trai	nsaction ID : SE-951439 of Disbursement or Obligation
Purpose of Expenditure Media Buy Category/ Type (004)	10 11 2016
Name of Federal Candidato Support Office Sou	ght: House District: 00
Donald J. Trump Spose Spose Presi	dent Senate State:
Calendar Year-To-Date Disburseing	ont For: Primary X General
1459931.62 2016 (**)	Other (specify) >
	of Public Distribution/Dissemination
Screen Strategies Media, LLC Date of Dissemination: 10/12/16	10 12 2016
Mailing Address 11150 Fairfax Blvd	- 12 - 2016 - 12 - 12 - 12 - 12 - 12 - 12 - 12 - 12
Suite 505	ount
City State Zip Code	74632.00
	saction ID : SE-951438 of Disbursement or Obligation
Purpose of Expenditure Media Buy Category/ Type Out	10 11 2016
Name of Federal Candidate Support Office Sou	ght: House District: 00
Donald J. Trump Presi	dent Senate State:
Calendar Year-To-Date Per Election for Office Sought Disburseme	ent For: ☐ Primary ☐ General Other (specily) ▶
(a) SUBTOTAL of Itemized Independent Expenditures	132132.00
(b) SUBTOTAL of Unitemized Independent Expenditures	
· **	. A note the second property of a second sec
(c) TOTAL Independent Expenditures	170032.00
•	
Under penalty of perjury I certify that the independent expenditures reported herein were not made in with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (i party committee) any political party committee or its agent.	
Kelly C. Ward	. 112011, 11 1 1 1 1
Signature Date 10	13 2016

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES					
(Schedule E)		PAGE 50 OF 60 FOR SE OF FORM 24/48			
NAME OF COMMITTEE (In Full)		FEC IDENTIFICATION NUMBER V			
DCCC		C C00000935			
	·	101 0000000			
Check if 24-hour report 348-hour report New report	Amends report lil	ed on hard to the state of the			
Full Name of Payee		Date of Public Distribution/Dissemination			
Screen Strategies Media, LLC Date of Dissemination: 10/25/16		10 25 2016			
Mailing Address 11150 Fairfex Blvd		South of Sandyand Conducationals			
Suite 505		Amount			
City State Zio	Code	121850.00			
Fairfax VA 220)30	Transaction ID : SE-952388 Date of Disbursement or Obligation			
Purpose of Expenditure Media Buy Ga	tegory/ CO4	10 18 2016			
Name of Federal Candidate	Support Off	ice Sought: House District: 00			
Oonald J. Trump	Oppose 5	President Senate State:			
Calendar Year-To-Date		sbursement For: Primary X General			
Per Election for Office Sought 43699	47.93	16 ☐ Other (specify) ▶			
Full Name of Payee		Date of Public Distribution/Dissemination			
Buying Time, LLC		[Z.A.W.] \ [B.A.B.] \ [A.A.B.A.A.A.]			
Date of Dissemination: 10/25/16 Mailing Address 650 Massachusetts Avenue NW		10 25 2016			
000 M25525M250M3 (10000), 1417		Amount			
Suite 210 City State Zip	Code	19691.00			
•	001	Transaction ID : SE-953229 Date of Disbursoment or Obligation			
Purpose of Expanditure Ci	itegory/	THE PARTY PORTS			
Media Buy	Type 004	10 24 2016			
Name of Federal Candidate	Support Of	fice Sought: House District: 00			
Donald J. Trump	Oppose D	President Senate State:			
Calendar Year To-Date		sbursement For: Primery General			
Per Election for Office Sought	69947.93	Other (specify)			
(a) SUBTOTAL of Itemized Independent Exponditures		141541.00			
		Book Sumation (Some conditional Symphosymbolic Research			
(b) SUBTOTAL of Uniternized Independent Expenditures	······				
		ا گاههای در میگون دارست به استان به این از در این			
(c) TOTAL independent Expenditures	············				
		entele attac timeterrepresentationshipmeter of			
Under penalty of perjury I certify that the independent expenditures repo	orted herein were not	made in cooperation, consultation, or concert			
with, or at the request or suggestion of, any candidate or authorized con party committoe) any political party committee or its agent.					
party community any pomoca party communes of no again.					
Kelly C. Wurd		10 TH 1 1 B TH 1 1 TH 1 TH 1 TH 1 TH 1 TH			
Signature	Date i	10 25 2016			
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24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES (Schedule E)	PAGE 57 OF 57 . FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full) DCCC C	IDENTIFICATION NUMBER ♥
Check If 24-hour report 48-hour report New report Amends report filled on	1 [676] , [VYVYYY]
Buying Time, LLC Date of Dissemination: 11/01/16	blic Distribution/Dissemination
Mailing Address 650 Massachusetts Avenue, NW Suite 210	
City State Zip Code Washington . DC 20001 Transaction	17175.00 n ID : SE-954373 bursement or Obligation
Purpose of Expanditure Media Buy Cotegory/ Type 004 10	28 2016
Name of Federal Candidate Donald J. Trump Support Office Sought: Oppose President	House District: 00 Senate State:
Calendar Year-To-Date Per Election for Office Sought Disbursement For: 2016 Other (Primary General
Screen Strategies Media, LLC Date of Dissemination: 11/01/16	blic Distribution/Dissemination
Mailing Address 11150 Foirfex Blvd Amount Suite 505	
City State Zip Code Fairfex VA 22030 Transaction Date of Dis	74850.00 ID : SE-954175 bursement or Obligation
Purpose of Expenditure Media Buy Category/ Type 004 10	1 D T 1 V Y 2016
Name of Federal Candidate Support Office Sought: Donald J. Trump Donald J. Trump President President Donald J. Trump Dona	House District: 00
Calendar Year-To-Date Per Election for Office Sought Sep4458.07 Disbursement For: 2016	Senate State: Primary Seneral Specify) >
(a) SUBTOTAL of Itemized Independent Expenditures	92025.00
(b) SUBTOTAL of Unitemized Independent Expenditures	
(c) TOTAL Independent Expenditures	14333615.05
Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooper with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reparty committee) any political party committee or its agent.	
Signature Date 11 02	2016

	18 HOUR REPORT OF INDEPENDENT EXPENDITURES (18 to 18 t	PAGE 11 OF 12
	<u> </u>	FOR SE OF FORM 24/48
	ME OF COMMITTEE (In Full)	FEC IDENTIFICATION NUMBER ▼
		C cooocoss
Che	ck if 24-hour report 48-hour report New report Amends report	filed on way / Osb /
	Full Name of Payee Screen Strategies Media, LLC	Date of Public Distribution/Dissemination
┢	. Date of Dissemination: 11/05/16 Mailing Address 11150 Fairfax Blvd	11 05 2016
	Suite 505	Amount
ŀ	City State Zip Code	58700.00
1	Fairfax VA 22030	Transaction ID : SE-954453 Date of Disbursement or Obligation
	Purpose of Expenditure Media Buy Category/ Type: 004	10 7 31 7 2016
ſ	Name of Federal Candidate Support C	Office Sought: House District: 00
	Trump, Donald, J., , Oppose	President Senate State:
		Disbursement For: Primary Seneral O16 Other (specify)
Ī	Full Name of Payeo Canal Partners Media, LLC Date of Dissemination: 11/06/16	Date of Public Distribution/Dissemination
	Mailing Address 25 Whitlock Place	Amount
·	. Suite 200 City State Zip Code	7910.00
	Marietta GA 30064	Transaction ID: SE-954884 Date of Disbursement or Obligation
	Purpose of Expenditure Media Buy Category/ Type 004	11 03 2016
	Name of Federal Candidate Support	Office Sought: House District: 00
	Trump, Donald, J., . Øppose	President Senate State:
		Disbursement For: Primary X General 2016 Other (specify) >
(a) SUBTOTAL of Itemized Independent Expenditures	66610.00
(b) SUBTOTAL of Unitemized Independent Expenditures	•
(c) TOTAL Independent Expenditures.a	
٧	Under penalty of perjury I certify that the independent expenditures reported herein were no vith, or at the request or suggestion of, any candidate or authorized committee or agent of carty committee) any political party committee or its agent.	ot made in cooperation, consultation, or concert either, or (if the reporting entity is not a political
	Ward, Kelly, C [Electronically Filed] Date	1.1 06 2016
	Signature	

NAME OF COMMITTEE (In Full) DCCC Check if 24-hour report	ow report 🔣 Amends rep	FEC IDENTIFICATION NUMBER C C00000935
Full Name of Payee Ralston Lapp Media, LLC Date of Dissemination: 10/14/16	ow report 🗷 Amends rep	ort filed on 10 14 2016
Ralston Lapp Media, LLC Date of Dissemination: 10/14/16		Analysis and an analysis
Mailing Address 1054 21st Street ANA		Date of Public Distribution/Dissemination 10 14 2016
Suite 430		Amount
City State Washington DC	Zip Code 20007	12260.71 Transaction ID : SE-951677 Date of Disbursement or Obligation
Purpose of Expenditure Media Production	Category/ Type 004	والمرافرة والمراز المرافي المرافي المرافي
Name of Federal Candidate Hurd, William,	Support M Oppose	Office Sought: House District: 23 President Senate State: TX
Calendar Year-To-Date Per Election for Office Sought	1648833.65	Disbursement For: Primary Generation Other (specify) ■
Full Name of Payee Buying Time, LLC Date of Dissemination: 10/14/16	.•	Date of Public Distribution/Dissemination
Mailing Address 650 Massachusetts Avenue, NW Suite 210		Amount
City State Washington DC	Zip Code 20001	53000.00 Transaction ID : SE-952374 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy	Category/ Type 004	CONTRACTOR OF THE PROPERTY AND ADDRESS OF THE PROPERTY ADDRESS OF THE PROPERTY AND ADDRESS OF THE PROPERTY ADDRESS OF
Name of Federal Candidate Trump, Donald, J.,	Support Coppose	Office Sought: House District: 00 Fresident Senate State:
Calendar Year-To-Date Per Election for Office Sought	1919459.68	Disbursement For: Primary General Primary Other (specify) ▶

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.

(c) TOTAL Independent Expenditures.....

Ward, Kelly, C., ,	[Electronically Filed]	Date	10	18	2016
Signature	• • • • • • • • • • • • • • • • • • • •		استسا	ليسكسيا	photo: Control of the Control

Image# 201610199033071490 24/48 HOUR REPORT OF INDEPE	NDENT EXPEND	ITURES	
(Schedule E)	•		PAGE 52 OF 52
NAME OF COMMITTEE (In Full)	•		FOR SE OF FORM 24/48
DCCC			FEC IDENTIFICATION NUMBER ▼ C C00000935
Check if 24-hour report 3 48-hour report	ort New rep	ort Amends repo	rt filed on
Full Name of Payee The New Media Firm, Inc.			Date of Public Distribution/Dissemination
Date of Dissemir Mailing Address 1730 Rhode Island Ave., N			10 18 2016 Amount
Suite 213			
City Washington	State DC	Zip Code 20036	3407.87 Transaction ID : SE-952382 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy Media Production		Category/ Type	10 ' 18 ' 2016
Name of Federal Candidate		Support	Office Sought: House District: 00
Trump, Donald, J., .		Coppose Oppose	President Senate State:
Calendar Year-To-Date Per Election for Office Sought		2613000.20	Disbursement For: Primary General 2016 Other (specify)
Full Name of Payee	· · · · · · · · · · · · · · · · · · ·		Date of Public Distribution/Dissemination
Buying Time, LLC Date of Dissemi	nation: 10/18/18		Links Land Links
Mailing Address 650 Massachusetts Aver	· · · · · · · · · · · · · · · · · · ·	——————————————————————————————————————	10 18 2016
Suite 210	ide, ivv		Amount
City	State	Zip Code	83829.00
Washington	DC	20001	Transaction ID : SE-952073 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy		Category/ Type 004	10 ' 17 ' 2016
Name of Federal Candidate Trump, Donald, J., ,		Support	Office Sought: House District: 00
Transpi Bandia, 6.1 1		Ŭ Oppose	President Senate State:
Calendar Year-To-Date Per Election for Office Sought		2613000,20	Disbursement For: Primary Seneral 2016 Other (specify)
(a) SUBTOTAL of Itemized Independent Exp	pendilures		87236.87
(b) SUBTOTAL of Unitemized Independent (Expenditures		•
(c) TOTAL Independent Expenditures:	***************************************		11152409.38
Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.			
Ward, Kelly, C., ,	[Electron	nically Filed Date	10 19 2016
Signature			استخصا استنسا

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES (Schedule E)	PAGE 52 OF 60 FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full)	FEC IDENTIFICATION NUMBER
DCCC	C coccoss
Check if 24-hour report 48-hour report New report Amends report filed on	U M " , M. D. , [A.L.A.A.A.]
Full Name of Payee Screen Strategies Media, LLC Date of Dissemination: 10/25/16	Date of Public Distribution/Dissemination
Mailing Address 11150 Fairfax Blvd	10 25 2016 Amount
Suite 505	the same on a section of an armine
City State Zip Code Fairfex VA 22030	64326.00 from Eaction ID : SE-953184 Date of Disbursement or Obligation
Purpose of Expenditure Modia Buy Category/ Type: 004	10 21 2016
Name of Federal Candidate Support Office S	Sought: House District: 00
	resident Senate State:
Calendar Year-To-Date Disburs 4360947 93 2016	ement For: Primary X General
For Elegitori is Office Stugitt	- Other (specify) ▶
Full Name of Payee Buying, Time, LLC Date of Dissemination: 10/25/16	Date of Public Olstribution/Olssemination
Mailing Address 650 Massachusetts Avenue, NW Suite 210	Amouni
City State Zlp Code	62488.00
Washington DC 20001	rensaction ID : SE-953185 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy Category/ Type 004	10 21 2016
Name of Federal Candidate Support Office S	Sought: House District: 00_
	resident Senale State:
Calendar Year-To-Date Per Election for Office Sought 4369947.93 Disburs- 2016	emont For: Primary General Other (specify)
(a) SUBTOTAL of Itemized Independent Expenditures	126814.00
(b) SUBTOTAL of Unitemized Independent Expenditures	وسود رحارتمان بالدالة بالمادة الدالة
(c) TOTAL Independent Expenditures	ومسود مراجع مستان الله الله الله الله الله الله الله ال
Under penalty of perjury I certify that the independent expenditures reported herein were not made with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or party committee) any political party committee or its agent.	o in cooperation, consultation, or concert or (if the reporting entity is not a political
Kelly C. IVard Date 10	25 2016